

MEMORANDUM

**SUBJECT: Southern California Gas Company Methane Gas Release
Aliso Canyon Natural Gas Storage Facility**

**FROM: Jared Blumenfeld
Regional Administrator, Region 9**

**TO: Matthew Fritz
Chief of Staff**

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in Los Angeles County. SoCal Gas injects natural gas into abandoned oil reservoirs for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Energy Utilities.

The Aliso Canyon storage facility contains 115 gas withdrawal/injection wells. The leaking well is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet), the second largest natural gas storage facility in the United States.

Porter Ranch, an residential community of approximately 30,000 people, is located 1 mile away. More than 1,800 families have been relocated by the gas company and 1,000 remain on a waiting list. Two local elementary schools with nearly 2,000 schoolchildren and staff are slated to be moved to other schools in January.

Current Status: SoCal Gas is the responsible party and is attempting to plug the leaking well with a team of well-control contractors. SoCal Gas is working to kill the well from the top and drilling relief wells to kill the well from the bottom. SoCal has 157 people in their Incident Action Plan working on this relief effort.

SoCal Gas has attempted multiple 'top kill' operations, none successful. They are concerned about degrading the integrity of the well bore. The next effort will pump material such as ball bearings in heavy mud down the wellbore in an attempt to stop the flow of gas.

SoCal Gas is drilling two relief wells. The relief well, if successful, will intercept the bottom of the leaking well and pump in cement. This technique has had great success in controlling blow outs. The drilling operation continues around the clock and the relief wells are estimated to take 3-4 months to complete.

Environmental and Public Health Issues: Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels substantially below the flammability limit and that do not represent an acute health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness. Residents have reported effects consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing health effects to some Porter Ranch residents and is requiring that SoCal Gas provide temporary relocation “As the duration of exposure increases, these trace levels can produce significant long-term health effects,” said Department of Public Health Interim Director Cynthia Harding. “As this incident has moved from a short-term exposure event resolved within days, to now a long-term event potentially lasting months, supplemental monitoring of potentially harmful trace chemicals is warranted.”

Regulatory Actions:

State Agencies: Division of Oil, Gas and Geothermal Resources (DOGGR), Department of Conservation, Natural Resources Agency; California Public Utility Commission (CPUC); California Office of Emergency Services (OES); California Environmental Protection Agency (Cal/EPA).

Local Agencies: Los Angeles County Certified Unified Program Agency (LA County CUPA) Los Angeles County Fire/HazMat; City of Los Angeles; South Coast Air Quality Management District (SCAQMD); Los Angeles County Department of Public Health

DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas’s plans for stopping the leak.

The CPUC is conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root-cause analysis of the well blow-out.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1st, 778 households had either relocated (282) or were in

the process of relocating (496). SoCal Gas has established a community center in Porter Ranch to answer questions and assist residents with temporary relocation and claims.

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency group with expertise in plume and atmospheric modeling.

Federal Actions:

The Region is participating in daily operational calls and providing daily summaries. On 15 December, two on-scene coordinators participated in a site tour with the Los Angeles County Fire and Hazardous Materials Unit and Lawrence Livermore National Laboratory. The most direct federal authority is held by the Department of Transportation, Office of Pipeline and Hazardous Materials Safety Administration. However the DOT authority has been delegated to California and it is not clear what action DOT is willing to take in this case.

[REDACTED]

[REDACTED]

On 18 December the Region issued an information request to SoCal Gas pursuant to the Clean Air Act Section 114.

Congressional Interest:

Region 9 is drafting a response to a letter from Congressman Sherman who is requesting an active EPA role in the response. We have also responded to inquiries from Senator Boxer's office.

[REDACTED]

Proboszcz, Angie

From: Moore, Letitia
Sent: Tuesday, December 22, 2015 3:07 PM
To: Keener, Bill
Subject: FW: Aliso Canyon - [REDACTED]
Attachments: Aliso Canyon - [REDACTED]

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

Letitia D. Moore
Assistant Regional Counsel | U.S. EPA Region IX
415.972.3928 | moore.letitia@epa.gov



United States Environmental Protection Agency

This email, including attachments, may contain information that is confidential and may be protected by the attorney-client or other privileges. This email, including attachments, is intended to be conveyed only to the designated recipient. If you are not an intended recipient, please delete this email, including attachments, and notify me by email or at (415)972-3928. The unauthorized use, dissemination, distribution or reproduction of this email, including attachments, is prohibited and may be unlawful.

From: Manzanilla, Enrique
Sent: Tuesday, December 22, 2015 11:50 AM
To: Cheatham, Reggie <cheatham.reggie@epa.gov>; Natarajan, Nitin <Natarajan.Nitin@epa.gov>; Tulis, Dana <Tulis.Dana@epa.gov>
Cc: Jordan, Deborah <Jordan.Deborah@epa.gov>; Adams, Elizabeth <Adams.Elizabeth@epa.gov>; Johnson, Kathleen <Johnson.Kathleen@epa.gov>; Quast, Sylvia <Quast.Sylvia@epa.gov>; Meer, Daniel <Meer.Daniel@epa.gov>; Moore, Letitia <Moore.Letitia@epa.gov>
Subject: Fwd: Aliso Canyon - [REDACTED]

Looping.....

Sent from my iPhone

Begin forwarded message:

From: "Blumenfeld, Jared" <BLUMENFELD.JARED@EPA.GOV>
Date: December 22, 2015 at 11:43:22 AM PST
To: "Strauss, Alexis" <Strauss.Alexis@epa.gov>, "Manzanilla, Enrique" <Manzanilla.Enrique@epa.gov>
Subject: FW: Aliso Canyon - [REDACTED]

From: Blumenfeld, Jared
Sent: Monday, December 21, 2015 5:10 PM
To: Matthew R. Fritz (fritz.matthew@epa.gov) <fritz.matthew@epa.gov>
Subject: Aliso Canyon - [REDACTED]

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From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 12:35 PM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Aliso Canyon

Hi Nahal,

Happy new year too. Thanks for this update.

Can you provide the files and documents the gas company has submitted in response to EPA's Dec. 18 information request? I'd rather not have to FOIA it if possible, but please let me know.

Thanks,

Tony

From: Mogharabi, Nahal [<mailto:MOGHARABI.NAHAL@EPA.GOV>]
Sent: Thursday, January 14, 2016 12:25 PM
To: Barboza, Tony
Subject: RE: Aliso Canyon

Hi Tony,

Happy New Year! Thanks for checking in. Regarding EPA's involvement, below is the latest.

U.S. EPA is participating in daily operational calls with these local and state regulators and Southern California Gas Company to stay abreast of developments in controlling the gas release and assisting local residents. On Dec. 18, U.S. EPA Region 9 sent a federal Clean Air Act information request letter to Southern California Gas Company (attached) for additional data and documents related to the facility and its operation. EPA is currently reviewing the information submitted and expects to receive additional information from the company in coming days. After completing its review of this

information and in consultation with the state and local regulators already active on the scene, EPA will determine the appropriate next steps.

As you know, California state and local agencies are on the forefront of the response to the Aliso Canyon natural gas leak. They include the California Office of Emergency Services (Cal OES), California Division of Oil, Gas and Geothermal Resources (DOGGR), the South Coast Air Quality Management District, the County of Los Angeles Fire and Public Health Departments, the City of Los Angeles, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), California Energy Commission (CEC), Division of Occupational Safety and Health (Cal/OSHA), and the Office of Environmental Health Hazard Assessment (OEHHA). Please see the California Office of Emergency Services website for the latest information: (<http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx>).

I can keep you posted as we have more information to share.

Hope all is well. Best,

Nahal

From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 9:36 AM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: Aliso Canyon

Hi Nahal,

Would you have a moment to discuss U.S. EPA's role in the response to the Aliso Canyon gas leak? I haven't heard much and would just like to understand the scope of the agency's involvement.

Thanks and best regards

Tony Barboza
Staff Writer
Los Angeles Times
Office: 213-237-6612
Cell: 213-219-0047
tony.barboza@latimes.com

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tony.barboza@latimes.com

Proboszcz, Angie

From: Mogharabi, Nahal
Sent: Tuesday, December 29, 2015 9:01 AM
To: Harris-Bishop, Rusty
Cc: Keener, Bill; Zito, Kelly
Subject: Re: media inquiry: Bloomberg News re: Aliso Canyon gas leak

Follow Up Flag: Follow up
Flag Status: Flagged

We can tell them this response had the latest on our end and leave it at that. We likely wouldn't be talking about it any further considering it's an open investigation at this point.

Nahal

On Dec 29, 2015, at 8:59 AM, "Harris-Bishop, Rusty" <Harris-Bishop.Rusty@epa.gov> wrote:

Yes I think the Sherman letter has the relevant information. Jeremy Johnstone is working in this issue with the State agencies but he's out until Monday.

Sent from my iPhone

On Dec 29, 2015, at 8:49 AM, Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV> wrote:

I believe so unless Rusty knows otherwise. I think we should use the Shermann letter as a response for consistency of messaging.

Nahal

On Dec 29, 2015, at 8:46 AM, "Keener, Bill" <Keener.Bill@epa.gov> wrote:

FYI...The WashPo article below is generating more press calls. Nahal and Rusty, who is our expert on this? Our response in writing would be along the lines of the response letter to Congr. Sherman last week, right?

Bill Keener
Office of Public Affairs
U.S. EPA - Region 9
San Francisco, CA
Phone: (415) 972-3940

From: Brian Wingfield (BLOOMBERG/ NEWSROOM:)
[<mailto:bwingfield3@bloomberg.net>]
Sent: Tuesday, December 29, 2015 8:05 AM
To: Keener, Bill <Keener.Bill@epa.gov>
Subject: request from Bloomberg News

Hi Bill,

I cover energy for Bloomberg News in Washington, D.C. I'm wondering if anyone from EPA's Region 9 office is available today to talk about the gas leak in California. (story attached.) I've also reached out to HQ here.

Thanks,
Brian Wingfield

Brian Wingfield
Bloomberg News
202-654-7318 office
202-664-6804 cell
Twitter @bwingfield

New Infrared Video Reveals Growing Environmental Disaster in
L.A. Gas Leak
2015-12-24 14:40:06.697 GMT

By Joby Warrick

Dec. 23 (Washington Post) -- A runaway natural gas leak from a storage facility in the hills above Los Angeles is shaping up as a significant ecological disaster, state officials and experts say, with more than 150 million pounds of methane pouring into the atmosphere so far and no immediate end in sight.

The rupture within a massive underground containment system — first detected more than two months ago — is venting gas at a rate of up to 110,000 pounds per hour, California officials confirm. The leak already has forced evacuations of nearby neighborhoods, and officials say pollutants released in the accident could have long-term consequences far beyond the region. Newly obtained infrared video captures a plume of gas — invisible to the naked eye — spouting from a hilltop in the Aliso Canyon area above Burbank, like smoke billowing from a volcano. Besides being an explosive hazard, the methane being released is a powerful greenhouse gas, more potent than carbon dioxide in trapping heat in the lower atmosphere.

Scientists and environmental experts say the Aliso Canyon leak instantly became the biggest single source of methane emissions in all of California when it began two months ago. The impact of greenhouse gases released since then, measured over a 20-year time frame, is the equivalent of emissions from six coal-fired power plants or 7 million automobiles, environmentalists say.

"It is one of the biggest leaks we've ever seen reported,"

said Tim O'Connor, California climate director for the Environmental Defense Fund, a nonprofit group that obtained the video. "It is coming out with force, in incredible volumes. And it is absolutely uncontained."

The gas is pouring from an underground storage field owned by the Southern California Gas Co. The facility, the largest of its kind on the West Coast, contains billions of cubic feet of natural gas, stored under pressure to supply the company's 20 million customers. While the exact cause of the leak is unknown, company officials believe the problem began when an underground well casing failed, allowing the pressurized gas to push through geological cracks to the surface near the community of Porter Ranch.

About 1,700 homes and two schools were evacuated because of the leak, as noxious odors settled over Porter Ranch, about 20 miles from downtown Los Angeles. California officials have aided the company in a series of efforts to stop the leak, but the state officials say it could be weeks or months before the gas flow is halted.

The gas company has pledged in statements to "execute all possible efforts" to plug the leak.

"SoCalGas recognized the impact this incident is having on the environment," company president Dennis V. Arriola said in a letter last week to Gov. Jerry Brown (D).). The company has drilled a relief well while also pouring a brine solution and other materials into the damaged well in an attempt to seal it, so far without significant results.

The company's losses in natural gas alone are estimated in the tens of millions of dollars, with total damages likely to exceed that figure many times over. A number of neighbors already

have filed lawsuits, part of a growing outcry that includes calls for the company to close the facility altogether.

The leak is a setback to California's efforts to reduce emissions blamed for climate change. The Brown administration is seeking to implement the country's toughest standards on greenhouse-gas emissions by promoting renewable energy and strengthening measures to prevent methane from escaping from refineries, pipelines and storage facilities.

"We've been working to terminate leaks," Dave Clegern, a spokesman for the California Air Resources Board, said in an interview. "This has been distressing to watch."

While the leak is unusually large, scientists and environmental groups have long sought to call attention to the problem of methane emissions from oil and gas operations.

The Obama administration announced proposed regulations over the summer to cut down on methane leaks from drilling and storage, citing concerns about the climatic impact of the approximately 7 million tons of methane lost to the atmosphere from industrial sources in the United States each year. Pound for pound, methane is about 25 times more potent as a greenhouse gas

than carbon dioxide as a greenhouse gas.

Adam Brandt, an assistant professor at Stanford University's Institute for the Environment, said substantial leaks can sometimes go completely undetected.

"Even large leaks can be hard to find if they occur away from populated areas," Brandt said. "One important step forward for sustainability will be to design ways to quickly detect and fix these large leaks soon after they happen."

More at Energy & Environment:

The world just adopted a tough new climate goal. Here's how hard it will be to meet

Obama just released the biggest energy efficiency rule in U.S. history

Why saving the Amazon means saving more than just trees

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-0- Dec/24/2015 14:40 GMT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 18 2015

Via email (DArriola@semprautilities.com) and Certified Mail

CERTIFIED MAIL NO. 7015 0640 0007 0638 0669
RETURN RECEIPT REQUESTED

In Reply Refer to:
Southern California Gas Company Aliso Canyon Natural
Gas Release

Dennis Arriola
President and CEO
Southern California Gas Company
555 W 5th St
Los Angeles, CA 90013-1010

RE: Request for Information, Southern California Gas Company Aliso Canyon Natural Gas
Release

Dear Mr. Arriola:

The United States Environmental Protection Agency ("EPA") is conducting an investigation of the natural gas release (the "Release") at the Southern California Gas Company (the "Company's") Aliso Canyon Natural Gas Storage Facility located at 12801 Tampa Ave. in Northridge, CA, (the "Facility") that was discovered on or about October 23, 2015.

With this letter and its enclosure ("Information Request"), EPA seeks additional information and documents concerning the Company's compliance with the Clean Air Act, 42 U.S.C. §§ 7401 *et seq* ("CAA"). This Information Request is authorized pursuant to Section 114 of the CAA, 42 U.S.C. § 9614. Your responses to this letter must be made by a letter, signed by a person or persons duly authorized to represent the Company. Electronic copies of submittals are preferred. EPA believes that much of the requested information is, or should be, readily available at the Facility. If there are any responsive documents or information which you are unable to provide, please provide an explanation for, and documentation of reasons for, the Company's inability to provide that information. Please send your submittals so that they are received by no later than **December 31, 2015**. Address your response to:

Kathryn Lawrence (SFD-9-3)
Section Chief
Emergency Prevention and Preparedness Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105
lawrence.kathryn@epa.gov

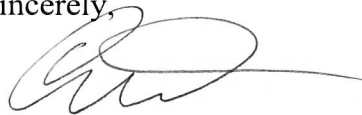
Please note that, pursuant to regulations located at 40 CFR Part 2, Subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information as defined in 40 CFR § 2.201(c). Asserting a business confidentiality claim does not relieve you from the obligation to fully respond to this letter. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 U.S.C. § 552. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulation. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. In addition, EPA has not waived any rights to take enforcement action for past or future violations.

The Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action being taken in accordance with Section 113 of the CAA, 42 U.S.C. § 7413. This may include civil and administrative penalties of up to \$37,500 per day of noncompliance. In addition, the submission of knowingly false or misleading statements may be punished by a fine pursuant to Title 18 of the U.S. Code, or by imprisonment for not more than two years, or both.

This request for information is not subject to review by the Office of Management and Budget ("OMB" under the Paperwork Reduction Act because it is not a "collection of information" within the meaning of 44 U.S.C. §§ 3502(3), 3507, and 3512. *See, also*, 4 CFR §§ 1320.3(c), 1320.5, and 1320.6(a). Furthermore, this request is exempt from OMB review under the Paperwork Reduction Act because it is part of an investigation of a specific individual or entity. 44 U.S.C. § 3518(c)(1); 5 CFR § 1320.4.

If you have questions about the legal aspects of this Information Request, please contact Ms. Letitia Moore, U.S. EPA Assistant Regional Counsel, at (415) 972-3928 or moore.letitia@epa.gov. The Region IX technical contact for this information request is Kathryn Lawrence, who may be reached at (415) 972-3039 or johnstone.jeremy@epa.gov. We thank you in advance for your cooperation.

Sincerely,



Enrique Manzanilla, Director
Superfund Division

Enclosures (2)

1 - Information Request

2 - Confidential Business Information

cc (via email w/enclosures):

Jimmie Cho, SoCalGas

John Geroch, DOGGR

Mohsen Nazemi, SCAQMD

Alice Reynolds, CalEPA

Bill Jones, LACFD

Gregory Reynar, LAFD



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Enclosure 1

Information Request
Southern California Gas Co.

Please provide the information requested in the Information Request section of this Enclosure such that it is received by no later than **December 31, 2015**.

INSTRUCTIONS

1. Please provide a separate response to each request, and identify each response by the number of the request to which it corresponds. For each document produced, identify the request to which it is responsive.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form
3. All responsive documents must be: a) provided as an accurate and legible copy in a searchable PDF file format; b) submitted on via electronic media (thumb drive, CD, or DVD); and c) number stamped in sequential order (e.g. BATES stamped). Furthermore, data should be provided in spreadsheet format (e.g., Excel format), when available, rather than as image or PDF formats.
4. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
5. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice. [Some EPA Regions refer to an enclosure such as the one I've included as "Enclosure 4" here for further discussion of the CBI issue and process].
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.

7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.

8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding the information.

DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean the Southern California Gas Co., or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by the Company at the Aliso Canyon Natural Gas Storage Facility property or properties located at 12801 Tampa Ave. in Northridge, CA, or contiguous or adjacent to that address.

3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.

5. "Release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances, extremely hazardous substances, regulated substances, air pollutant, pollutants or contaminants. "Release" shall include "accidental release" as that term is defined by 40 C.F.R. § 68.3.

7. "Standard Operating Procedure" or "SOP" means any express method or series of protocols to be followed routinely for the performance of designated operations or in designated situations by you or your subcontractors.

8. "Well SS 25 Release" shall mean the Release of odorized natural gas from Facility Standard Sesnon Well SS 25 that commenced on or about October 23, 2015.

9. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, 40 CFR Part 302, 40 CFR Part 355 or 40 CFR Part 372, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUEST

1. Provide the following general information:
 - a. A Facility map and plot plan, to include the well pad for Standard Sesnon Well 25 ("Well SS 25");
 - b. A description of the Facility and operations;
 - c. A management organizational chart for the Facility (include identification of personnel with environmental responsibilities); and
 - d. Descriptive information about any/all other natural gas storage fields owned or operated by the Company and/or its parent corporation.
2. With respect to the Well SS 25 Release provide copies of all submittals made to any local, state or federal agencies relating to the Release as of the date of the response to this Information Request.
3. Unless otherwise provided in response to Item 2 above, provide the following regarding the Well SS 25 Release. If provided in in response to Item 2 above, identify the corresponding document and page numbers.
 - a. A map or other depiction showing, as well as a description of, the point(s) of the Release;
 - b. A description of the cause of the Release, including all known and/or suspected root causes and contributory factors;
 - c. Design specifications for Well SS 25;
 - d. A detailed history of physical changes or modifications made to Well SS 25, including the dates such modifications were implemented and the purpose for which the modifications were made;
 - e. A description of the Company's mechanical integrity program for the inspection, testing and preventive maintenance for Well SS 25, including leak detection;
 - f. All documents that describe Standard Operating Procedures used in the inspection, testing and preventive maintenance of Well SS 25, including leak detection;
 - g. A listing of recognized and generally accepted good engineering practices, used in the development and implementation of the Company's inspection, testing and preventive maintenance of Well SS 25;
 - h. Inspection, maintenance, and leak detection records for Well SS 25 from January 1, 2012 to the present;

- i. All documents that describe Standard Operating Procedures used for accident mitigation or emergency response regarding any risks associated with the maintenance and operation of Well SS 25 or other similarly-situated wells;
- j. A description of current fire safety/prevention measures being implemented both at the Release point(s) and at the Well SS 25 wellhead;
- k. A description of current Incident Command Structure (ICS) organizational structure (ICS 207 or equivalent);
- l. Identification of any/all incident-specific website(s) that any safety and/or regulatory agencies have current access to. Provide access to EPA;
- m. Identify and provide copies of any notifications of the Release made to public agencies, including agency name; date, time and method of notification; whom contacted; and notification/report number (as applicable);
- n. Copies of the Company's policies and procedures with respect to public agency notifications of natural gas leaks at the Facility;
- o. Company-prepared estimates of release rates to the atmosphere (daily, weekly, monthly, and/or yearly) for natural gas, total volatile organic compounds (VOCs) (as defined under 40 CFR § 51.100) and total reduced sulfur (TRS) from Well SS 25 during the Well SS 25 Release, with supporting documentation of methodology/methodologies employed in arriving at estimate(s); and
- p. A description of all activities undertaken, as of the date of your response to this Information Request, to mitigate the rate and quantity of natural gas released during the Well SS 25 Release.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Enclosure 2

**Confidential Business Information (CBI)
Assertion and Substantiation Requirements**

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business’s competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R.

§ 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph and sentence when identifying the information subject to your claim.
2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R.

§ 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Letitia Moore
Assistant Regional Counsel
U.S. EPA Region 9
75 Hawthorne St.
San Francisco, CA 94105
Moore.letitia@epa.gov

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your answers or comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

**OFFICE OF THE
REGIONAL ADMINISTRATOR**

The Honorable Brad Sherman
United States House of Representatives
1030 Longworth House Office Building
Washington, DC 20515

Dear Representative Sherman:

Thank you for your letter of December 10, 2015, to Administrator Gina McCarthy regarding the gas leak at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility in Aliso Canyon, Los Angeles County. Administrator McCarthy has asked me to respond on her behalf.

The U.S. Environmental Protection Agency shares your concern about the public health and environmental effects of the gas release and has already been investigating the incident. In addition to sending an information request under the authority of the Clean Air Act to SoCal Gas on December 18, U.S. EPA Region 9 is participating in daily operational calls with State and local regulators to stay abreast of developments in controlling the gas release and assisting local residents. Two Region 9 on-scene coordinators toured the Aliso Canyon site with the Los Angeles County Fire and Hazardous Materials Unit and representatives from Lawrence Livermore National Laboratory.

Given that the Aliso Canyon Natural Gas Storage Facility is regulated under the federal Pipeline Safety Act, U.S. EPA also contacted the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration regarding its authorities to take action. We are in contact with the California Public Utilities Commission (CPUC) and the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). DOGGR has issued two orders to SoCal Gas, requiring it to provide information on the leaking well, develop plans for expeditiously capturing the escaping gas, stopping the leak, and communicating with state and local regulators. The CPUC is also conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root cause analysis of the well blowout.

Local authorities such as the South Coast Air Quality Management District and the Los Angeles County Department of Public Health have also issued orders to SoCal Gas. The latter order requires SoCal Gas to provide temporary relocation to residents, and hundreds of households have either relocated or are in the process of relocating. SoCal Gas has established a community center in the nearby Porter Ranch community to answer questions and assist residents with temporary relocation and claims.

We are pleased that our state and local partners are taking these important steps to protect public health and safety, and we will continue to investigate and monitor the situation. We stand ready to help in any way if our assistance is requested pending the results of our investigation.

If you have further questions, please have your staff contact EPA's Congressional Liaison, Brent Maier, at (415) 947-4256, maier.brent@epa.gov, or Dan Meer, Assistant Director for Emergency Response, Preparedness and Prevention, at (415) 972-3132, meer.daniel@epa.gov.

Sincerely,

Alex. Strauss
for Jared Blumenfeld *24 Dec. 2015*

Proboszcz, Angie

From: Johnstone, Jeremy
Sent: Friday, January 15, 2016 2:16 PM
To: Lindsay, Nancy;Johnson, Kathleen;Cheatham, Reggie;Keener, Bill;Manzanilla, Enrique
Cc: Meer, Daniel;Jordan, Deborah;Quast, Sylvia;Johnstone, Jeremy;Lawrence, Kathryn;Boone, David;Eoc, Epahq;Lee, Eugene;Schumann, Jean;Moore, Letitia;Minor, Dustin;Zito, Kelly;Zabel, Allan;Kao, Jessica;Irizarry, Gilberto;Adams, Elizabeth;Strauss, Alexis;Blumenfeld, Jared
Subject: Aliso Canyon Situational Update for 15 January 2016 - Pre Decisional - Do Not Release
Attachments: Aliso Canyon Update 15Jan16.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

New information highlighted yellow. The next update will be distributed on Tuesday 19 January.

Jeremy Johnstone
Environmental Engineer
Emergency Prevention and Preparedness Section (Mail Code SFD-9-3)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
Tel: 415-972-3499
Cell: 415-816-6584
email: johnstone.jeremy@epa.gov

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Proboszcz, Angie

From: Glenn, William
Sent: Wednesday, January 13, 2016 5:08 PM
To: Keener, Bill;Zito, Kelly;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele;Karlson, Kristine
Subject: End of Day -- January 13, 2016

Follow Up Flag: Follow up
Flag Status: Flagged

MEDIA

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LA Daily News: Ran Op-Ed on Trash Policy from Jared in today's paper and online.

Cleaning up the Pacific Garbage Patch: <http://www.dailynews.com/opinion/20160113/how-californias-new-trash-control-policy-can-help-shrink-the-pacific-garbage-patch>. WATER. CLOSED. (v). Nahal Mogharabi.

The following press release was issued today: [U.S. EPA Approves California's New Trash Control Policy](#). WATER. CLOSED. Nahal Mogharabi.

WEB

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Social Media:

Children's Health – At the request of headquarters, shared a post to our [Facebook](#) page about our commitment to children's health and linked to our editorial in the National Institute of Health's Environmental Health Perspectives newsletter, [Renewing the Federal Commitment to Advance Children's Health](#).

Web Updates:

California Air Actions – Posted a link to the Federal Register notice for the South Coast Reclassification as Serious Nonattainment for 2006 PM2.5 to the [News and Events page](#).

Online Updates:

Transit Subsidy FAQs – Posted an updated version of the [Transit Subsidy FAQ](#).

Building Project – Added the latest progress report / photos to the [Construction page](#) in the Building Project site.

CONGRESSIONAL & INTERGOVERNMENTAL

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Sen. Barbara Boxer and Sen. Dianne Feinstein: A letter sent to DOT Secretary Anthony Fox, EPA Administrator Gina McCarthy, and DOJ Attorney General Loretta Lynch regarding the Aliso Canyon Natural Gas Storage Facility uncontrolled leak was shared with RA Blumenfeld by Senate Environment and Public Works Committee staffer Jason Albritton. The letter requests that EPA, DOT, and provide the Senators with the following information: 1) An update on actions taken

by each of your agencies to date, including any direction or advice you are providing to State agencies and Southern California Gas Company on the response; 2) A description of how state agencies have exercised any delegated Federal authorities in relation to this natural gas leak and a description of your oversight of the use of these Federal authorities; 3) A legal analysis of any Federal authorities that could apply to this incident and storage fields in general and how your agencies have exercised these authorities to date; and 4) A technical analysis of whether Southern California Gas Company could more quickly reduce the gas stored in the facility to mitigate the uncontrolled leak of natural gas. A copy of the letter is available upon request. This letter has been controlled to Region IX, however, OCIR is working directly with the Senators offices' and whether a written response is needed is still under discussion.

OCIR Request for One-Pager on Aliso Canyon: Brent Maier shared a one-pager per OCIR's request on Aliso Canyon prepared by our Office of Regional Counsel and Superfund Division for the Administrator's briefing book for an upcoming hearing before the House Agricultural Committee.

Rep. Mark Amodei (R-NV-3): Brent Maier reached out to Jason Riederer earlier today who is the Legislative Director for Congressman Mark Amodei regarding their interest in setting up a briefing with the Congressman on Anaconda Copper Mine Site. Jason responded and shared with us a list of 11 specific questions that he would like answered before a briefing is scheduled. They would like to schedule a call or in-person briefing before January 27th if possible. Brent will be working with the Congressman's scheduler, Rachel Provost, to schedule a day/time that will work.

Rep. Steve Knight (R-CA-25): The Congressman wrote an opinion column in today's LA Daily News regarding his efforts to address the Aliso Canyon/Porter Ranch natural gas leak. Congressman Steve Knight, R-Santa Clarita, represents California's 25th District, including Porter Ranch. Link to opinion column:

<http://www.dailynews.com/opinion/20160112/porter-ranch-needs-leadership-not-politics-steve-knight>

WOTUS: The House voted today to overturn the WOTUS rule from the Environmental Protection Agency that asserts federal authority over small waterways. The House passed the resolution 253-166 Wednesday, with 12 Democrats supporting it. Rep. Chris Smith (N.J.) was the only Republican to vote against the measure. The measure is now headed to President Obama's desk; he has promised to veto it. The Clean Water Rule is not currently being enforced because of a federal court ruling that blocked its implementation while it is being litigated.

Congressional Outreach on EPA Approval of New California Trash Control Policy: Brent Maier shared today's press release with Congressional staff for the entire California Congressional delegation regarding EPA recently approving the State Water Resources Control Board's new water quality standards for trash in California's waters. The standards are part of the state's new Trash Control Policy, designed to keep trash out of streams, lakes, bays, estuaries, coastal and ocean waters in California to protect people and the environment.

Sen. Martin Heinrich (D-NM): A final draft response to the incoming letter from Sen. Martin Heinrich regarding uranium cleanup operations at Northeast Churchrock Mine, Quivira/Kerr-McGee Mine, and the UNC Church Rock Mill is being finalized for concurrence chain for RA signature. Brent Maier extended the due date of this letter until Thursday, January 15, 2016 to provide time for final review and signature.

Rep. Brad Sherman (D-CA-30): A final draft EPA response to the incoming letter from Congressman Sherman on Aliso Canyon has been drafted by ORC and shared with PHMSA. This will be a joint response with PHMSA and FERC once a draft is ready to send to OCIR's Carolyn Levine for their assistance and coordination of working with PHMSA and FERC to finalize a draft that will be signed by EPA Administrator Gina McCarthy along with PHMSA, and FERC.

Rep. David Valadao (R-CA-21): Rep. David Valadao yesterday introduced legislation to approve a contentious deal between the federal government and the powerhouse Westlands Water District resolving a long-running dispute over drainage water and forgiving the district's \$350 million debt to federal taxpayers. Under the [agreement](#), which was filed in September in U.S. District Court for the Eastern District of California, Westlands will assume responsibility for its drainage issues and drop its suit against Interior in exchange for forgiveness of its outstanding debt from the construction of the CVP itself -- a value of about \$350 million. The measure, despised by environmentalists and northern

Californians, only stands to complicate efforts to move a drought bill for the Golden State. - [H.R. 4366: To affirm an agreement between the United States and Westlands Water District dated September 15, 2015, and for other purposes.](#) This bill was referred to the House Committee on Natural Resources which will consider it before sending it to the House floor for consideration.

Region IX Hot Issues for Upcoming U.S. Conference of Mayors Winter Meeting: Brent Maier compiled and sent forward to OCIR's Arnita Hannon some Region IX Hot Issues for a select group of Region IX Mayors that are members of the Environment Committee and who will be meeting in conjunction with the U.S. Conference of Mayors Winter Meeting on January 20 – 22, 2016. The Hot Issues were for the following Mayors and included: Mayor Carolyn Goodman, Las Vegas, NV - Making a Visible Difference in Communities (MVD); Mayor Ashley Swearengin, Fresno, CA - Strong Cities, Strong Communities (SC2-Fresno).

Legislative Action:

January 11, 2016 - [H.R. 653: FOIA Act](#) - This bill's text for status *Passed the House (Engrossed)* (Jan 11, 2016) is now available.

January 11, 2016 - [H.R. 1155: SCRUB Act of 2016](#) - Searching for and Cutting Regulations that are Unnecessarily Burdensome Act of 2016 (SCRUB). This bill's text for status *Referred to Senate Committee* (January 11, 2016) is now available.

January 11, 2016 - [H.R. 3231: Federal Intern Protection Act of 2015](#) - This bill's text for status *Passed the House (Engrossed)* (January 11, 2016) is now available.

January 11, 2016 - [H.R. 4359: Administrative Leave Reform Act](#) - This bill's text is now available.

January 11, 2016 - [H.R. 4360: Official Personnel File Enhancement Act](#) - This bill's text is now available.

January 12, 2016 - [H.R. 1644: STREAM Act](#) - Supporting Transparent Regulatory and Environmental Actions in Mining Act (STREAM). This bill's text for status *Passed the House (Engrossed)* (January 12, 2016) is now available.

January 12, 2016 - [H.R. 4358: Senior Executive Service Accountability Act](#) - Last Action: Ordered to be reported by Voice Vote. The committees assigned to this bill sent it to the House or Senate as a whole for consideration on January 12, 2016.

Proboszcz, Angie

From: Glenn, William
Sent: Thursday, January 07, 2016 4:57 PM
To: Keener, Bill
Cc: Barkett, Bonnie;Hudnall, Patricia;Nelson, Patti;Pratt, Kristen;Schmidt, David
Subject: FW: Web End of Day Report

Follow Up Flag: Follow up
Flag Status: Flagged

Bill Glenn
Chief, Web + Internal Communications
Office of Public Affairs
U.S. EPA, Pacific Southwest
glenn.william@epa.gov / (415) 947-4254

From: Barkett, Bonnie
Sent: Thursday, January 07, 2016 2:37 PM
To: Glenn, William <Glenn.William@epa.gov>
Cc: Hudnall, Patricia <Hudnall.Patricia@epa.gov>
Subject: Web End of Day Report

Social Media:

Climate Change – Posted to our [Facebook](#) page a [video of Gina McCarthy at the Council on Foreign Relations](#), discussing the Paris Climate Change conference.

Web Updates:

Aliso Canyon – Posted a page in our Media Center with a brief statement on the [SoCalGas natural gas leak at Aliso Canyon](#) and links to CA OES's website and EPA correspondence on the matter.

Bonnie Barkett
Office of Public Affairs
U.S. Environmental Protection Agency
(415) 947-4175

Proboszcz, Angie

From: Glenn, William
Sent: Wednesday, January 06, 2016 12:53 PM
To: SHOJI, KERRY
Cc: COHEN, Deborra; Holoubek, Helga; Zito, Kelly; Keener, Bill; Barkett, Bonnie
Subject: RE: Porter Ranch Gas Leak - Public calls about EPA's lack of involvement.
Attachments: EPA Letter to Dennis Arriola Request for Info.pdf; EPA Letter to The Hon Brad Sherman.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Kerry,

Thanks for letting us know about the nature of the calls coming in. While state and local agencies are indeed in the lead on this, we figured we'd start getting attention once we became involved.

Bill and Kelly have been working on putting together a statement on our involvement, which I've included below. Please feel free to use it as a response to inquiries. At this point, online information about the leak response (by an array of state agencies) has been consolidated at the CA OES website linked below.

Bonnie will be working to add the Aliso Canyon Natural Gas Leak link (going to the CA OES site) to the lists of hot topics on our 'About Region 9,' 'EPA in California' and 'EPA Region 9 News and Events' pages. We'll also likely be posting a couple of documents – our Dec. 18 information request to SoCal Gas and our Dec. 24 response to an inquiry from Rep. Brad Sherman – all of which should help folks who are searching for information on the leak response. Those docs are attached here in case you want to send them out before we have them posted online (which should be later today or tomorrow).

Keep us posted on how things go in case there are additional things we can do to provide folks with information. And feel free to give me a call if you'd like to discuss!

Bill

U.S. EPA involvement in the Aliso Canyon natural gas leak response

California state and local agencies are on the forefront of the response to the Aliso Canyon natural gas leak. They include the California Office of Emergency Services (Cal OES), California Division of Oil, Gas and Geothermal Resources (DOGGR), the South Coast Air Quality Management District, the County of Los Angeles Fire and Public Health Departments, the City of Los Angeles, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), California Energy Commission (CEC), Division of Occupational Safety and Health (Cal/OSHA), and the Office of Environmental Health Hazard Assessment (OEHHA). Please see the California Office of Emergency Services website for the latest information:
(<http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx>).

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request letter to Southern California Gas Company for additional data and documents related to the facility and its operation. EPA is currently reviewing the information submitted and expects to receive additional information from the company in coming days. After completing its review of this information and in consultation with the state and local regulators already active on the scene, EPA will determine the appropriate next steps.

Bill Glenn
Chief, Web + Internal Communications
Office of Public Affairs
U.S. EPA, Pacific Southwest
glenn.william@epa.gov / (415) 947-4254

From: SHOJI, KERRY
Sent: Wednesday, January 06, 2016 10:39 AM
To: Glenn, William <Glenn.William@epa.gov>
Cc: COHEN, Deborra <Cohen.Deborra@epa.gov>; Holoubek, Helga <Holoubek.Helga@epa.gov>; Zito, Kelly <ZITO.KELLY@EPA.GOV>
Subject: Porter Ranch Gas Leak - Public calls about EPA's lack of involvement.
Importance: High

Hi Bill,

We have been receiving more and more calls from the public recently demanding to know what the EPA is doing to help stop the gas leak at Porter Ranch. Initially callers were pacified with refers to the SoCalGas website for updates. The calls have evolved to the point that we are getting people are angry and threatening to call their legislators. Some accuse the EPA of not doing anything for three months until their recent involvement in December. All are concerned about their families health. Some are concerned their property values. Some are concerned about the environment and the air quality degradation. There is nothing on our website indicating any involvement.

I have tried to explain to callers that the leak was handled at the local level (regional/state) until recently, but they generally do not want to hear this or what services SoCalGas is providing to local residents— they only want to hear that there is progress being made and what we (the EPA) is doing about it.

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A caller today, [REDACTED] a CT resident, is a grandfather of 2, his son and daughter-in-law live at Porter Ranch. He is concerned for their health and wanted to know why the EPA didn't get involved sooner. He pointed out we didn't have anything about Porter Ranch gas leak on our website. He told me he has contacted his senator and urged his son to do so as well.

Is there anyone here that we can refer callers to about EPA involvement with Porter Ranch? Is there anything we can post on our website about our involvement?

--Kerry

Kerry L. Shoji, MLIS
Librarian (contractor, ASRC Primus)
U.S. EPA Region 9 Library /75 Hawthorne Street/ San Francisco, CA 94105-3920

shoji.kerry@epa.gov

415-972-3695 phone

415-947-3553 fax

<http://www.epa.gov/region9/library>

Proboszcz, Angie

From: COHEN, Deborra
Sent: Wednesday, January 06, 2016 1:06 PM
To: Glenn, William;SHOJI, KERRY
Cc: Holoubek, Helga;Zito, Kelly;Keener, Bill;Barkett, Bonnie
Subject: RE: Porter Ranch Gas Leak - Public calls about EPA's lack of involvement.

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks, Bill. Will be very helpful.

Deborra Cohen

US EPA, Pacific Southwest (Region 9)
Director, Environmental Information Center / Library

Cohen.Deborra@epa.gov / 415-972-3655
<http://www.epa.gov/region9/library>

U.S. EPA Region 9 Library / 75 Hawthorne St. / San Francisco, CA 94105

From: Glenn, William
Sent: Wednesday, January 06, 2016 12:53 PM
To: SHOJI, KERRY <SHOJI.KERRY@EPA.GOV>
Cc: COHEN, Deborra <Cohen.Deborra@epa.gov>; Holoubek, Helga <Holoubek.Helga@epa.gov>; Zito, Kelly <ZITO.KELLY@EPA.GOV>; Keener, Bill <Keener.Bill@epa.gov>; Barkett, Bonnie <Barkett.Bonnie@epa.gov>
Subject: RE: Porter Ranch Gas Leak - Public calls about EPA's lack of involvement.

Hi Kerry,

Thanks for letting us know about the nature of the calls coming in. While state and local agencies are indeed in the lead on this, we figured we'd start getting attention once we became involved.

Bill and Kelly have been working on putting together a statement on our involvement, which I've included below. Please feel free to use it as a response to inquiries. At this point, online information about the leak response (by an array of state agencies) has been consolidated at the CA OES website linked below.

Bonnie will be working to add the Aliso Canyon Natural Gas Leak link (going to the CA OES site) to the lists of hot topics on our 'About Region 9,' 'EPA in California' and 'EPA Region 9 News and Events' pages. We'll also likely be posting a couple of documents – our Dec. 18 information request to SoCal Gas and our Dec. 24 response to an inquiry from Rep. Brad Sherman – all of which should help folks who are searching for information on the leak response. Those docs are attached here in case you want to send them out before we have them posted online (which should be later today or tomorrow).

Keep us posted on how things go in case there are additional things we can do to provide folks with information. And feel free to give me a call if you'd like to discuss!

Bill

U.S. EPA involvement in the Aliso Canyon natural gas leak response

California state and local agencies are on the forefront of the response to the Aliso Canyon natural gas leak. They include the California Office of Emergency Services (Cal OES), California Division of Oil, Gas and Geothermal Resources (DOGGR), the South Coast Air Quality Management District, the County of Los Angeles Fire and Public Health Departments, the City of Los Angeles, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), California Energy Commission (CEC), Division of Occupational Safety and Health (Cal/OSHA), and the Office of Environmental Health Hazard Assessment (OEHHA). Please see the California Office of Emergency Services website for the latest information:
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A caller today, Richard M. Mitchell, 203-270-5523, a CT resident, is a grandfather of 2, his son and daughter-in-law live at Porter Ranch. He is concerned for their health and wanted to know why the EPA didn't get involved sooner. He pointed out we didn't have anything about Porter Ranch gas leak on our website. He told me he has contacted his senator and urged his son to do so as well.

Is there anyone here that we can refer callers to about EPA involvement with Porter Ranch? Is there anything we can post on our website about our involvement?

--Kerry

Kerry L. Shoji, MLIS
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Proboszcz, Angie

From: Allen, Laura
Sent: Thursday, January 21, 2016 12:47 PM
To: Keener, Bill
Cc: Zito, Kelly; Jones, Enesta
Subject: Re: two announcements today

Follow Up Flag: Follow up
Flag Status: Flagged

Great, thanks!

On Jan 21, 2016, at 3:04 PM, Keener, Bill <Keener.Bill@epa.gov> wrote:

Yes...

Desk Statement: U.S. EPA involvement in the Aliso Canyon natural gas leak response

California state and local agencies are on the forefront of the response to the Aliso Canyon natural gas leak. They include the California Office of Emergency Services (Cal OES), California Division of Oil, Gas and Geothermal Resources (DOGGR), the South Coast Air Quality Management District, the County of Los Angeles Fire and Public Health Departments, the City of Los Angeles, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), California Energy Commission (CEC), Division of Occupational Safety and Health (Cal/OSHA), and the Office of Environmental Health Hazard Assessment (OEHHA). Please see the California Office of Emergency Services website for the latest information: (<http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx>).

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Response for those looking for information on the methane leak. Since California agencies are leading the response to the natural gas leak at Southern California Gas Company's Aliso Canyon storage facility, the best contacts for emissions/leak estimates, monitoring, characterizations, etc. are the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD). Their contacts are below. You can find information on emissions from the California Office of Emergency Services webpage, which is the central clearinghouse for information on the incident: <http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx>. On this site, you can find links to the latest report on estimated Greenhouse Gas Emissions: http://www.arb.ca.gov/research/aliso_canyon/aliso_canyon_natural_gas_leak_updates-sa_flights_thru_dec_23_2015.pdf as well as Community Methane Monitoring: http://www.arb.ca.gov/research/aliso_canyon/community_methane_monitoring.htm

CARB contact:
David Clegern
916-322-8286
dclegern@arb.ca.gov

SCAQMD contact:
Tina Cox
Senior Public Information Specialist
Office: 909-396-3233 Mobile: 909-720-7063
tcx@aqmd.gov

Bill Keener
Office of Public Affairs
U.S. EPA - Region 9
San Francisco, CA
Phone: (415) 972-3940

From: Allen, Laura
Sent: Thursday, January 21, 2016 10:59 AM
To: Zito, Kelly <ZITO.KELLY@EPA.GOV>; Keener, Bill <Keener.Bill@epa.gov>
Cc: Jones, Enesta <Jones.Enesta@epa.gov>
Subject: RE: two announcements today

Bill- can you share the talking points on Aliso you all have been using? Thanks

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Proboszcz, Angie

From: Allen, HarryL
Sent: Tuesday, December 29, 2015 3:16 PM
To: Lawrence, Kathryn
Cc: Meer, Daniel;Eoc, Epahq;Johnson, Kathleen;Keener, Bill;Lee, Eugene;Lindsay, Nancy;Manzanilla, Enrique;Moore, Letitia;Quast, Sylvia;Schumann, Jean;Ty, Fatima;Benson, Craig
Subject: Re: Aliso Canyon Situation Update for 29 December 2015

Follow Up Flag: Follow up
Flag Status: Flagged

Updates in bold/ital/underline

PRE DECISIONAL – ATTORNEY CLIENT PRIVILEGE – DO NOT RELEASE

Southern California Gas Company Methane Release

Aliso Canyon Natural Gas Storage Facility

29 December 2015

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in the northern San Fernando Valley, Los Angeles County. SoCal Gas injects natural gas into the abandoned oil reservoir for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Utilities.

The Aliso Canyon storage facility is located near Porter Ranch, a residential community of approximately 30,000 people. The nearest Porter Ranch residents that are being affected live approximately 1 mile away and 1200 feet below the leaking wellhead.

The Aliso Canyon facility contains 115 gas withdrawal/injection wells and the well that is leaking, Well SS 25, is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet) of natural gas, one of the largest storage facilities in the United States.

Levels of methane, the principal component of natural gas, are being monitored in the residential areas.

Current Status (information extracted from Incident Reports and Official Websites):

Weather: Partly Cloudy and 61 degrees high on Tues. Winds expected to be 10-15 mph.

Well Management:

SS-25 (Leaking well site): There were seven attempts at well kill from Oct. 25 to Dec.22. All were unsuccessful. Other ongoing remedial actions include;

- Drilling relief wells to intercept SS25. Drilling is being conducted 24/7.
- Gas withdrawal at the facility to further reduce overall storage reservoir pressure and leak flow rate.
- Evaluate feasibility of additional well pumping operations to stop the leak.
- Reviewing engineering solutions to capture gas escaping from SS25 surface area.
- Put SS25 into production by attaching piping to system withdrawal if conditions are safe.

A 100 foot steel constructed bridge was put in place to create work platform at well head and to secure piping. Post well kill clean up and site assessment was delayed at SS-25 recently due to gusty winds.

Operations unchanged since 12/28

Relief Well #1 (P-39A): P-39A remains on schedule at approximately 4000 ft. A cement plug was installed. The drilling remains on schedule, however project completion is weather influenced and is not expected for 2-3 months.

Relief Well #2 (PS-20): Site grading continues to prepare the drill pad and remains on schedule.

Kill Attempt on SS-25: With the kill attempt on 12/22 unsuccessful, they continue to assess the condition of the wellhead and the condition is not good. Considerable drill mud was kicked back from the bore hole and is in the well head area and on the bridge structure over the well head. Up to 3 feet of heavy drilling mud was on the bridge, causing it to bow. There is no pressure gauge on the well head post kill attempt. The size of the crater around the well head may have increased considerably. This will become clearer as they clean the mud from the well head area and the bridge. They may have to clean the mud manually (shovels and buckets) as bringing equipment to the well head area may not be safe. If the crater has expanded greatly in size, that will complicate the options for gas capture and other work at the well head.

Gas Capture Options: AE Com and Fluor engineering contractors are evaluating options for gas capture at the well head. The engineering studies are ongoing and focus on capture, recompression, incineration or treatment through activated charcoal. Previously, SoCal Gas was considering options for reinjection of the gas but now they are just considering destruction, either through incineration (not flaring) or activated charcoal. SCAQMD pointed out that they would need permits for either of those options. Gas capture would require them to construct a platform over the well head upon which a capture device could be positioned. It did not sound like there were many feasible options for gas capture.

Air Monitoring: Air monitoring continues at 19 stations, 10 in Porter Ranch and 9 at the facility. SoCal Gas continues to offer in home air filters and weather stripping, with 4236 homes scheduled for installation to date. **A revised air monitoring plan will be submitted to AQMD this week.**

Communications: SoCal Gas continues to receive numerous visitors to their Customer Resource Center(CRC) which is expanding to adjoining retail space. The CPUC President is scheduled to visit site 12/28/2015. Local Media coverage remains high with some national news coverage as well.

Community Outreach: SoCal Gas continues to offer relocation of Porter Ranch residents and they have 15 companies assisting with this effort. More than 8000 residential and commercial properties have potential impacts. The next community meeting is scheduled for 29 December at 6 pm.

- Relocations – SoCal Gas has received 6576 inquiries for relocation out of the affected area in Porter Ranch. SoCal Gas has placed 2258 citizens in temporary housing, 1081 requests are in process, 1035 newly assigned to temporary home providers, 1172 are unassigned or uncalled. 900 residents have declined relocation and 139 have checked out and gone home.
- Air Purification - 148 residents have received air purification systems in their homes as well as weather stripping, 176 residents have received activated charcoal filters, and 1360 residents are scheduled for whole house air purification systems.

Recent State/Local Agency Actions:

California Air Resources Board

On Dec. 23, the California Air Resources Board issued an update to preliminary estimates of greenhouse gas emissions around the well site. The current estimate of the cumulative leak volume was reported as 1.6 MMTCO₂. The estimate of the current rate of release was reported to be 30,300 kg methane per hour.

Los Angeles County Fire CUPA

On December 17, 2015, LA County CUPA conducted an inspection on hazardous-waste, hazardous materials, and above ground storage tanks at SoCal Gas Aliso facility. The CUPA proposes to issue a Notice of Violation in the coming week.

Los Angeles Unified School District

The Los Angeles Unified School District's Board of Education took action on Dec 17 to expedite the temporary relocation of Castlebay Lane Charter and Porter Ranch Community School, the relocation will be in effect for the rest of the 2015-16 school year. **School is scheduled to resume on 1/11 in the space available.**

SCAQMD

SCAQMD has filed a petition with the SCAQMD [Hearing Board](#) for an [Order for Abatement](#) that will require SoCal Gas to take specific steps to abate the natural gas leak, monitor the leaking gas, and reduce the impacts of nuisance odors on the local community. **A public hearing has been scheduled for 9:00 a.m. on Saturday, January 9, 2016, in the Auditorium of the Granada Hills Charter High School.** During the hearing, members of the public may provide testimony before the Hearing Board. This testimony, coupled with the facts presented by SCAQMD and SoCalGas at the hearing, will assist the Hearing Board when ruling on the SCAQMD's petition.

Sent from my iPad

On Dec 28, 2015, at 4:38 PM, Lawrence, Kathryn <Lawrence.Kathryn@epa.gov> wrote:

New information is shaded yellow.

Kathryn Lawrence
Chief, Emergency Prevention and Preparedness
Superfund Division, EPA Region 9
(415) 972-3039

<Aliso Canyon Natural Gas Leak Update 12-28-2015final.pdf>

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Begin forwarded message:

From: "Barboza, Tony" <Tony.Barboza@latimes.com>
Date: January 14, 2016 at 6:18:57 PM PST
To: "Mogharabi, Nahal" <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Aliso Canyon

Nahal,

Did EPA make an independent determination that the entire response is confidential business information as the company claims? Or does the company asserting such a claim on its own shield these records from public disclosure?

I ask because page 2 of EPA's letter says "information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulation." That seems to suggest there are ways the information can be released.

Could you explain?

Thanks,

Tony

From: Mogharabi, Nahal [<mailto:MOGHARABI.NAHAL@EPA.GOV>]
Sent: Thursday, January 14, 2016 3:38 PM
To: Barboza, Tony
Subject: RE: Aliso Canyon

Hi Tony,

I looked into this. At this stage, Southern California Gas Company's entire response to U.S. EPA's Clean Air Act 114 information request regarding the Aliso Canyon natural gas leak is covered by its confidential business information (CBI) claim and therefore EPA is unable to provide copies of their response either informally or in response to a Freedom of Information Act request.

Thanks,

Nahal

From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 12:35 PM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Aliso Canyon

Hi Nahal,

Happy new year too. Thanks for this update.

Can you provide the files and documents the gas company has submitted in response to EPA's Dec. 18 information request? I'd rather not have to FOIA it if possible, but please let me know.

Thanks,

Tony

From: Mogharabi, Nahal [<mailto:MOGHARABI.NAHAL@EPA.GOV>]
Sent: Thursday, January 14, 2016 12:25 PM

To: Barboza, Tony
Subject: RE: Aliso Canyon

Hi Tony,

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I can keep you posted as we have more information to share.

Hope all is well. Best,

Nahal

From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 9:36 AM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: Aliso Canyon

Hi Nahal,

Would you have a moment to discuss U.S. EPA's role in the response to the Aliso Canyon gas leak? I haven't heard much and would just like to understand the scope of the agency's involvement.

Thanks and best regards

Tony Barboza
Staff Writer
Los Angeles Times
Office: 213-237-6612
Cell: 213-219-0047
tony.barboza@latimes.com

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Sent: Thursday, January 14, 2016 12:25 PM
To: Barboza, Tony
Subject: RE: Aliso Canyon

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As you know, California state and local agencies are on the forefront of the response to the Aliso Canyon natural gas leak. They include the California Office of Emergency Services (Cal OES), California Division of Oil, Gas and Geothermal Resources (DOGGR), the South Coast Air Quality Management District, the County of Los Angeles Fire and Public Health Departments, the City of Los Angeles, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), California Energy Commission (CEC), Division of Occupational Safety and Health (Cal/OSHA), and the Office of Environmental Health Hazard Assessment (OEHHA). Please see the California Office of Emergency Services website for the latest information: (<http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx>).

I can keep you posted as we have more information to share.

Hope all is well. Best,

Nahal

From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 9:36 AM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: Aliso Canyon

Hi Nahal,

Would you have a moment to discuss U.S. EPA's role in the response to the Aliso Canyon gas leak? I haven't heard much and would just like to understand the scope of the agency's involvement.

Thanks and best regards

Tony Barboza

Staff Writer

Los Angeles Times

Office: 213-237-6612

Cell: 213-219-0047

tony.barboza@latimes.com

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 12:35 PM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Aliso Canyon

Hi Nahal,

Happy new year too. Thanks for this update.

Can you provide the files and documents the gas company has submitted in response to EPA's Dec. 18 information request? I'd rather not have to FOIA it if possible, but please let me know.

Thanks,

Tony

From: Mogharabi, Nahal [<mailto:MOGHARABI.NAHAL@EPA.GOV>]
Sent: Thursday, January 14, 2016 12:25 PM
To: Barboza, Tony
Subject: RE: Aliso Canyon

Hi Tony,

Happy New Year! Thanks for checking in. Regarding EPA's involvement, below is the latest.

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Thanks and best regards

Tony Barboza

Staff Writer

Los Angeles Times

Office: 213-237-6612

Cell: 213-219-0047

tony.barboza@latimes.com

Proboszcz, Angie

From: Keener, Bill
Sent: Thursday, January 07, 2016 4:58 PM
To: Glenn, William;Zito, Kelly;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele;Karlson, Kristine
Subject: End of Day -- January 7, 2016

Follow Up Flag: Follow up
Flag Status: Flagged

MEDIA

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New York Times: Graphics Editor Rebecca Kai is seeking data on leak rates and cumulative totals for the Southern California Gas leak at the Aliso Canyon facility. Sent her contact info for CARB and SCAQMD and link to the Cal OES website, which is clearinghouse for state information on the incident. CLOSED. (v) Contact: Kelly Zito

The Guardian: Reporter Suzanne Goldenberg is seeking information about the Southern California Gas leak at the Aliso Canyon facility, including background on any interplay between methane and ozone and data about ozone attainment areas across the state. Working with Air Div. and HQ on developing responses. Also sent her information on state agencies/contacts. AIR. OPEN. (v) Contact: Kelly Zito

Sierra Magazine: Fact checker Katherine Schuknecht verifying SCR use in Arizona, coordinated with Air division, referred her to plants in AZ as agency is technology neutral: CLOSED (v) Air

Los Angeles News Group: Reporter Stephanie Baer requested data reports on all lakes in California that were tested for cyanotoxins in 2015, as well as background information on the "2015 Cyanotoxins for California Lakes Waters" project. Reporter also requested a tour of the Region 9 lab, to find out more about how samples are tested. WATER. OPEN. (v) Contact: Michele Huitric

Reuters: Correspondent Sarah McBride had follow up questions and needed assistance with our TRI Explorer. Sent her HQ contact to help walk her through the database. CLOSED. ENF. (v.) Soledad Calvino.

KCSN News Radio: Reporter Diana Jimenez interviewed Karen Jurist and Rich Hiatt regarding the Cooper Drum settlement. CLOSED. (V) Superfund. Rusty Harris-Bishop

WEB

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Social Media:

Climate Change – Posted to our [Facebook](#) page a [video of Gina McCarthy at the Council on Foreign Relations](#), discussing the Paris Climate Change conference.

Web Updates:

Aliso Canyon – Posted a page in our Media Center with a brief statement on the [SoCalGas natural gas leak at Aliso Canyon](#) and links to CA OES’s website and EPA correspondence on the matter.

CONGRESSIONAL & INTERGOVERNMENTAL

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Congressman Steve Knight (R-CA-25). Staffer Brandon Eden asked for a call so that EPA Region R9 can explain to the Congressman EPA’s limited role with respect to the SoCal Gas natural gas leak at Aliso Canyon. Will set up call, likely for this Friday, and Jared and Sylvia may take the call. Bill Keener

Proboszcz, Angie

From: Keener, Bill
Sent: Thursday, December 31, 2015 2:30 PM
To: Glenn, William;Zito, Kelly;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele
Subject: End of Day -- December 31, 2015

Follow Up Flag: Follow up
Flag Status: Flagged

MEDIA

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Al Jazeera: Writer Peter Moskowitz is seeking EPA response on community members' contention that more federal oversight is needed for facilities such as the Aliso Canyon natural gas storage facility. Sent him information request letter and Congressman Sherman letter. (v) OPEN. Sfund/ORC. Contact: Kelly Zito

Upvoted.com (Reddit): Staff writer Gabrielle Canon inquired about what information Southern California Gas has shared with EPA as of Dec. 31 in response to agency information request on the Aliso Canyon natural gas leak. Communicated that since the deadline is Dec. 31, EPA would not know what information SoCal Gas has shared until the end of the day. (v) CLOSED. SFund/ORC. Contact: Kelly Zito

WEB

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Social Media:

Year in Review – Posted to our [Facebook](#) and [Twitter](#) pages about our [2015 enforcement results](#).

CONGRESSIONAL & INTERGOVERNMENTAL

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Rep. Brad Sherman (D-CA-30): As a follow up to our call yesterday with the Congressman's staff, we committed to update his staff on the status of SoCal Gas's response to U.S. EPA's 114 information request. Brent Maier let them know that SoCal Gas's lawyers called our Regional Counsel's office late yesterday to let us know that they will not be able to provide us with all of the requested information by the end of the day today, but that they will provide us with as much as possible and will continue to provide us with the remainder as they receive it. We committed to keep his staff updated if we do not receive at least a partial response by the end of the day.

Legislation Update:

December 28, 2015 - Enacted - [H.R. 1321: Microbead-Free Waters Act of 2015](#). Last Action: This bill was enacted after being signed by the President on December 28, 2015.

Proboszcz, Angie

From: Nazmi, Niloufar
Sent: Friday, January 22, 2016 12:48 PM
To: Lakin, Matt
Subject: Fwd: Porter Ranch Alyso Canyon Methane Gas Leak

For awareness only.

Niloufar

Niloufar Nazmi

U.S. Environmental Protection Agency
Desk: [415.972.3684](tel:415.972.3684) | Mobile: 415.328.1143|

Begin forwarded message:

From: "Glenn, William" <Glenn.William@epa.gov>
Date: January 22, 2016 at 12:42:06 PM PST
To: "COHEN, Deborra" <Cohen.Deborra@epa.gov>, "Keener, Bill" <Keener.Bill@epa.gov>, "Nazmi, Niloufar" <Nazmi.Niloufar@epa.gov>
Cc: "Mogharabi, Nahal" <MOGHARABI.NAHAL@EPA.GOV>, "Meer, Daniel" <Meer.Daniel@epa.gov>, "Zito, Kelly" <ZITO.KELLY@EPA.GOV>
Subject: RE: Porter Ranch Alyso Canyon Methane Gas Leak

Thanks, Deb. I'm thinking as issues arise, it might be a good idea to also routinely loop in Dan Meer as well.

Here are those links you sent to Dan, in case they're useful for folks. I've also included the statement from a couple weeks back that I believe we've been using as a basis for responses to public inquiries – just in case anyone is aware of any new information we should be including.

<http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx> California Office of Emergency Services

<http://www.aqmd.gov/home/regulations/compliance/aliso-canyon-update> South Coast Air Quality Mgt District

http://oehha.ca.gov/public_info/emergency/alisocanyon.html California Office of Environmental Health Hazard Assessment

http://oehha.ca.gov/public_info/emergency/pdf/AlisoCanyonPorterRanchFAQ01152016.pdf California Office of Environmental Health Hazard Assessment

<http://content.govdelivery.com/accounts/USNLMTEH/bulletins/1307102?reqfrom=share> National Library of Medicine compilation of health and toxicological data

U.S. EPA involvement in the Aliso Canyon natural gas leak response

California state and local agencies are on the forefront of the response to the Aliso Canyon natural gas leak. They include the California Office of Emergency Services (Cal OES), California Division of Oil, Gas

and Geothermal Resources (DOGGR), the South Coast Air Quality Management District, the County of Los Angeles Fire and Public Health Departments, the City of Los Angeles, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), California Energy Commission (CEC), Division of Occupational Safety and Health (Cal/OSHA), and the Office of Environmental Health Hazard Assessment (OEHHA). Please see the California Office of Emergency Services website for the latest information: (<http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx>).

The U.S. Environmental Protection Agency is participating in daily operational calls with these local and state regulators and Southern California Gas Company to stay abreast of developments in controlling the gas release and assisting local residents. On Dec. 18, U.S. EPA Region 9 sent a federal Clean Air Act information request letter to Southern California Gas Company for additional data and documents related to the facility and its operation. EPA is currently reviewing the information submitted and expects to receive additional information from the company in coming days. After completing its review of this information and in consultation with the state and local regulators already active on the scene, EPA will determine the appropriate next steps.

Bill Glenn
Chief, Web + Internal Communications
Office of Public Affairs
U.S. EPA, Pacific Southwest
glenn.william@epa.gov / (415) 947-4254

From: COHEN, Deborra
Sent: Friday, January 22, 2016 12:32 PM
To: Keener, Bill <Keener.Bill@epa.gov>; Nazmi, Niloufar <Nazmi.Niloufar@epa.gov>; Glenn, William <Glenn.William@epa.gov>
Cc: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Porter Ranch Alyso Canyon Methane Gas Leak

Hi, Dan Meer said he would respond. I didn't cc Bill Keener or Nahal on my email to Dan. Bill K, Nahal, Niloufar and Bill G – in general, should I include all 4 of you in emails pertaining to Porter Ranch?
Bill K and Nahal, do you want me to forward the email I sent to Dan Meer? It contained a list of several website links to the resources that have been established by South Coast, Cal OES, OEHHA, NLM.

Deborra Cohen
Director, Environmental Information Center / Library

Cohen.Deborra@epa.gov / 415-972-3655
<http://www.epa.gov/region9/library>

U.S. EPA Region 9 Library / 75 Hawthorne St. / San Francisco, CA 94105

From: Keener, Bill
Sent: Friday, January 22, 2016 12:18 PM

To: Nazmi, Niloufar <Nazmi.Niloufar@epa.gov>; COHEN, Deborra <Cohen.Deborra@epa.gov>; Glenn, William <Glenn.William@epa.gov>
Cc: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Porter Ranch Alyso Canyon Methane Gas Leak

And looping in Nahal for situational awareness.

Bill Keener

Office of Public Affairs
U.S. EPA - Region 9
San Francisco, CA
Phone: (415) 972-3940

From: Nazmi, Niloufar
Sent: Friday, January 22, 2016 7:44 AM
To: COHEN, Deborra <Cohen.Deborra@epa.gov>; Glenn, William <Glenn.William@epa.gov>
Cc: Keener, Bill <Keener.Bill@epa.gov>
Subject: Fwd: Porter Ranch Alyso Canyon Methane Gas Leak

This is a citizen inquiry I was referred to us from headquarters. If I should be forwarding it to someone else please let me know.

Niloufar

Niloufar Nazmi

U.S. Environmental Protection Agency
Desk: [415.972.3684](tel:415.972.3684) | Mobile: 415.328.1143|

Begin forwarded message:

From: "Dennis, Allison" <Dennis.Allison@epa.gov>
Date: January 22, 2016 at 7:10:16 AM PST
To: "Nazmi, Niloufar" <Nazmi.Niloufar@epa.gov>
Subject: FW: Porter Ranch Alyso Canyon Methane Gas Leak

Hi Nilofaur,

Can you get this citizen inquiry to the right person in r9?

-----Original Message-----

From: Wieder, Jessica
Sent: Friday, January 22, 2016 10:07 AM
To: Dennis, Allison <Dennis.Allison@epa.gov>
Cc: Egidi, Philip <Egidi.Philip@epa.gov>
Subject: FW: Porter Ranch Alyso Canyon Methane Gas Leak

Allison,

Can you forward this public question to the appropriate contact in Region 9? It was sent to one of my radiation technical experts. Thank you. - Jess

From: Roberta [REDACTED]

Sent: Saturday, January 16, 2016 9:40 PM
To: Egidi, Philip <Egidi.Philip@epa.gov>
Subject: Porter Ranch Alyso Canyon Methane Gas Leak

Egidi, I emailed H.E.E.T. and they referred me to you.

I emailed them to thank them for coming to the San Fernando Valley area to take readings of the methane gas that is leaking from Porter Ranch and posting the video. We are concerned residents of the San Fernando Valley, trying to gather all the information we can, since governmental authorities seem to have their lips sewn shut.

I downloaded the air quality readings from the So Cal Gas website, but do not have the scientific background to decipher the information. Is there anyone there that can help us with that?

Or, can you give us information as to how to protect ourselves, (flammable gas detectors, NBC gas masks, access to number of animal and human illnesses and or deaths?).

We have been awaiting to hear back from our friend Caroline regarding autopsy/toxicology results of her cousin Gwen, who lived in Porter Ranch and was VERY ILL during the holiday. Gwen spent Christmas and New Year with her cousin Caroline in Big Bear and displayed symptoms of nausea, vomiting, headaches and hot and cold flashes. On January 1st Caroline noticed her cousin stopped breathing and had to give her CPR. Caroline called the ambulance and Gwen died either on the way to the hospital or after she got there.

Please help us in any way you can!

Thank You, Roberta Griego

[REDACTED]

Jessica Wieder
U.S. EPA
Radiation Protection Program
Center for Radiation Information and Outreach
w: 202-343-9201
c: 202-420-9353

From: Egidi, Philip
Sent: Friday, January 22, 2016 9:52 AM
To: Wieder, Jessica
Cc: Peake, Tom; Schultheisz, Daniel
Subject: Re: Porter Ranch Alyso Canyon Methane Gas Leak

To my knowledge, it has not been passed along yet...

PVE

From: Wieder, Jessica
Sent: Friday, January 22, 2016 9:25 AM
To: Egidi, Philip
Cc: Peake, Tom; Schultheisz, Daniel
Subject: Re: Porter Ranch Alyso Canyon Methane Gas Leak

Just got back from travel. Has this been passed along? If not, let me know and I will send it to the region.

Jess

Jessica Wieder
U.S. Environmental Protection Agency
Radiation Protection Program
202-343-9201
m: 202-420-9353

Sent from my iPhone

On Jan 19, 2016, at 9:14 AM, Egidi, Philip
<Egidi.Philip@epa.gov<<mailto:Egidi.Philip@epa.gov>>> wrote:

Not sure who to hand this off to, IED or the Region?

Discuss.

PVE

Philip Egidi

Environmental Scientist

U.S. Environmental Protection Agency

Radiation Protection Division

Washington, DC

(202) 343-9186 (work)

(970) 209-2885 (Cell)

"The health of the people is the highest law."

Cicero (106 - 43 BC)

From: Roberta [REDACTED]
Sent: Saturday, January 16, 2016 9:40 PM
To: Egidi, Philip <Egidi.Philip@epa.gov<<mailto:Egidi.Philip@epa.gov>>>
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Please help us in any way you can!

Thank You, Roberta Griego



Proboszcz, Angie

From: Nazmi, Niloufar
Sent: Thursday, January 07, 2016 12:27 PM
To: Zito, Kelly;Adams, Elizabeth;Keener, Bill;Glenn, William;Harris-Bishop, Rusty;Machol, Ben;Lakin, Matt
Subject: House Dems push Obama admin for info on gas leak

House Dems push Obama admin for info on gas leak

[Geof Koss](http://www.eenews.net/greenwire/2016/01/07/stories/1060030280), E&E reporter <http://www.eenews.net/greenwire/2016/01/07/stories/1060030280>

Published: Thursday, January 7, 2016

Top Democrats on the House Energy and Commerce Committee are pressing the Obama administration for answers on the massive methane leak ongoing in Los Angeles.

Led by ranking member Frank Pallone (D-N.J.), Democrats yesterday asked U.S. EPA Administrator Gina McCarthy and Transportation Secretary Anthony Foxx for a briefing by both agencies by Jan. 13 on steps being taken to address the leak from Southern California Gas Co.'s Aliso Canyon natural gas storage facility.

The site has been spewing methane since October, forcing evacuations from the Porter Ranch neighborhood in the San Fernando Valley and prompting California Gov. Jerry Brown (D) yesterday to declare a state of emergency ([ClimateWire](#), Jan. 7).

"The leak may be emitting between 40 and 64 tons of methane every hour, increasing California's methane emissions by a quarter," [wrote](#) the Democrats, who include Energy and Power Subcommittee ranking member Bobby Rush (D-Ill.) and Oversight and Investigations Subcommittee ranking member Diana DeGette (D-Colo.).

"As of January 5, over 78,000 metric tons of methane are estimated to have escaped, the equivalent of burning more than 737 million gallons of gasoline."

Aside from the climate impacts of methane -- a potent greenhouse gas -- the trio also note that more than 2,000 households have been relocated, after widespread complaints over nausea, headaches and dizziness, with another 1,500 relocations reportedly underway. The operator has estimated that the leak won't be capped until late next month or even early March.

"This is far more than just a nuisance for neighbors," the lawmakers said in a statement. "We are seeing another potentially catastrophic man-made disaster with far-reaching impacts on the environment and public health. We are asking these agencies to provide the Committee with specific information as to how this leak is being addressed at the federal level so that the thousands of families affected finally get the answers they deserve."

The letter follows a similar plea by Rep. Brad Sherman (D-Calif.) this week to six state, local and federal agencies calling for "coordination and cooperation in finding a solution to the Porter Ranch gas leak."

Niloufar

Niloufar Nazmi
U.S. Environmental Protection Agency
Desk: 415.972.3684 | Mobile: 415.328.1143|

Proboszcz, Angie

From: Manzanilla, Enrique
Sent: Monday, January 11, 2016 5:13 PM
To: Adams, Elizabeth;Lakin, Matt
Subject: FW: Aliso Canyon Situational Update for 11 January 2016 - Pre Decisional - Do Not Release
Attachments: Aliso Canyon Update 01.11.16.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Enrique Manzanilla
Director, Superfund Division
US EPA Region 9 - Pacific Southwest
(415) 972 3843

From: Meer, Daniel
Sent: Monday, January 11, 2016 5:12 PM
To: Lindsay, Nancy <Lindsay.Nancy@epa.gov>; Johnson, Kathleen <Johnson.Kathleen@epa.gov>; Cheatham, Reggie <cheatham.reggie@epa.gov>; Tulis, Dana <Tulis.Dana@epa.gov>; Keener, Bill <Keener.Bill@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; Strauss, Alexis <Strauss.Alexis@epa.gov>; Blumenfeld, Jared <BLUMENFELD.JARED@EPA.GOV>
Cc: Jordan, Deborah <Jordan.Deborah@epa.gov>; Quast, Sylvia <Quast.Sylvia@epa.gov>; Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>; Boone, David <Boone.David@epa.gov>; Eoc, Epahq <Eoc.Epahq@epa.gov>; Lee, Eugene <Lee.Eugene@epa.gov>; Schumann, Jean <Schumann.Jean@epa.gov>; Moore, Letitia <Moore.Letitia@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>; Zito, Kelly <ZITO.KELLY@EPA.GOV>; Zabel, Allan <Zabel.Allan@epa.gov>; Kao, Jessica <Kao.Jessica@epa.gov>; Irizarry, Gilberto <Irizarry.Gilberto@epa.gov>
Subject: RE: Aliso Canyon Situational Update for 11 January 2016 - Pre Decisional - Do Not Release

New information is shaded yellow.

Dan

Daniel A. Meer, Assistant Director
Superfund Division
Emergency Response, Preparedness and Prevention Branch
415.972.3132 (O)
415.971.6792 (C)

Proboszcz, Angie

From: Manzanilla, Enrique
Sent: Thursday, January 07, 2016 5:10 PM
To: Natarajan, Nitin
Cc: Cheatham, Reggie; Adams, Elizabeth; Lakin, Matt; Blumenfeld, Jared; Meer, Daniel; Strauss, Alexis; Cheatham, Reggie
Subject: FW: Aliso Canyon Situational Update for 7 January 2016 - Pre Decisional - Do Not Release
Attachments: Aliso Canyon Update 01.07.16.pdf
Importance: High
Follow Up Flag: Follow up
Flag Status: Flagged

We still owe you a summary of the RRT call which we will send later tonight. Not much new information. Several PHMSA staff on the call.

But here's the latest update from today. Note the highlighted narrative especially with regard to gas capture system.

Enrique Manzanilla
Director, Superfund Division
US EPA Region 9 - Pacific Southwest
(415) 972 3843

From: Meer, Daniel
Sent: Thursday, January 07, 2016 4:58 PM
To: Lindsay, Nancy <Lindsay.Nancy@epa.gov>; Johnson, Kathleen <Johnson.Kathleen@epa.gov>; Cheatham, Reggie <cheatham.reggie@epa.gov>; Tulis, Dana <Tulis.Dana@epa.gov>; Keener, Bill <Keener.Bill@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Cc: Jordan, Deborah <Jordan.Deborah@epa.gov>; Quast, Sylvia <Quast.Sylvia@epa.gov>; Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>; Boone, David <Boone.David@epa.gov>; Eoc, Epahq <Eoc.Epahq@epa.gov>; Lee, Eugene <Lee.Eugene@epa.gov>; Schumann, Jean <Schumann.Jean@epa.gov>; Moore, Letitia <Moore.Letitia@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>; Zito, Kelly <ZITO.KELLY@EPA.GOV>; Zabel, Allan <Zabel.Allan@epa.gov>; Kao, Jessica <Kao.Jessica@epa.gov>; Irizarry, Gilberto <Irizarry.Gilberto@epa.gov>
Subject: RE: Aliso Canyon Situational Update for 7 January 2016 - Pre Decisional - Do Not Release

Update for 7 January 2016

Daniel A. Meer, Assistant Director
Superfund Division
Emergency Response, Preparedness and Prevention Branch
415.972.3132 (O)
415.971.6792 (C)

Proboszcz, Angie

From: Manzanilla, Enrique
Sent: Monday, January 04, 2016 4:38 PM
To: Meer, Daniel
Cc: Lakin, Matt;Jordan, Deborah;Lawrence, Kathryn;Johnstone, Jeremy
Subject: FW: ATTORNEY CLIENT PRIVILEGED -- ATTORNEY WORK PRODUCT -- DO NOT RELEASE UNDER FOIA

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

Enrique Manzanilla
Director, Superfund Division
US EPA Region 9 - Pacific Southwest
(415) 972 3843

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Proboszcz, Angie

From: nathan.schoenkin@dot.gov
Sent: Wednesday, December 30, 2015 2:49 PM
To: Manzanilla, Enrique
Cc: Lawrence, Kathryn;lynn.slepski@dot.gov
Subject: Re: Aliso Canyon Methane Leak

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you Enrique, please let me know if I can be of further assistance to you and your staff.

You can contact me at 202-604-8279 or 202-740-1978.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Manzanilla, Enrique
Sent: Wednesday, December 30, 2015 5:29 PM
To: Natarajan, Nitin; Slepski, Lynn A (OST); Parrish, Cayce
Cc: Schoenkin, Nathan (PHMSA); Lawrence, Kathryn; Meer, Daniel; Johnson, Kathleen; Quast, Sylvia; Moore, Letitia; Cheatham, Reggie
Subject: Re: Aliso Canyon Methane Leak

Hello Captain Slepski:

As Nitin described, we here in the EPA Regional Office in San Francisco have been participating on the daily phone calls with So Cal Gas and other state and local entities. My emergency planning and preparedness manager, Kay (Kathryn) Lawrence, has been in contact with Nathan as well. Last week, our Regional Administrator, Jared Blumenfeld, spoke with PHMSA Administrator Dominguez about the gas leak and the scope of our involvement. This type of facility is excluded from our response authorities under CERCLA (the Superfund law) and we are currently examining the limited scope of our authorities under the Clean Air Act.

We have sent So Cal Gas an information request and I've attached that request for your information. We have asked them to provide a wide range of information, described in the attachment, and should receive it by Thursday. I expect much of it will be the same information and plans So Cal Gas has provided to state and local agencies. In addition, I also attach a recent response to Congressman Brad Sherman and his incoming letter to the EPA. We have also responded to phone inquiries from Senator Boxer's office.

Thanks for sharing your background and update information. We will do the same and continue our coordination with Nathan and anyone else you would recommend. Of course, feel free to contact me directly if you have any questions.

Best Regards and Happy New Year!

Enrique Manzanilla

Director, Superfund Division

US EPA Region 9

415 972 3843

From: Natarajan, Nitin
Sent: Wednesday, December 30, 2015 12:47 PM
To: lynn.slepski@dot.gov; Parrish, Cayce
Cc: nathan.schoenkin@dot.gov; Manzanilla, Enrique
Subject: RE: Aliso Canyon Methane Leak

Lynn,

Thanks for reaching out. Our R9 staff have been involved and have been participating in the daily calls. Enrique Manzanilla's (cc'd) staff are the ones engaged. We had two on-scene coordinators participate in the site visit earlier this month and are continuing to examine EPA impacts and are available to support as needed.

If you need additional, please feel free to reach out.

N

Nitin Natarajan

Deputy Assistant Administrator

Office of Land and Emergency Management

Environmental Protection Agency

202-566-0200 Office

From: lynn.slepski@dot.gov [mailto:lynn.slepski@dot.gov]
Sent: Wednesday, December 30, 2015 3:40 PM
To: Natarajan, Nitin <Natarajan.Nitin@epa.gov>; Parrish, Cayce <Parrish.Cayce@epa.gov>
Cc: nathan.schoenkin@dot.gov; lynn.slepski@dot.gov
Subject: [SPAM] FW: Aliso Canyon Methane Leak
Importance: High

Nitin/Cayce.....

I've been asked by the Pipelines and Hazardous Materials Safety Administration to reach out to EPA to determine if you are aware of and monitoring the Aliso Canyon Methane Leak. PHMSA is providing technical assistance to the California Public Utilities Commission which is the State pipeline safety program.

Background: The pipeline safety statutes allow for States to assume safety authority over the intrastate gas and hazardous liquid pipelines through Certifications and Agreements with PHMSA under 49 U.S.C. §§ 60105- 60106. To participate in the pipeline safety program States must adopt the minimum pipeline safety regulations; however, States may pass more stringent regulations for pipeline safety through their State Legislatures.

PHMSA is also monitoring a SoCalGas daily call which takes place at 1200 Eastern. The call in number for the conference line is 1-866-462-0164, and the participant code is *1540875*. The air quality data that SoCalGas has uploaded can be found here<<https://www.alisoupdates.com/acu-aliso-canyon-air-sample-results>>, but as you can see the last data set is December 17th.

Missing Required Technology | SoCalGas | Aliso Canyon Air ...<<https://www.alisoupdates.com/acu-aliso-canyon-air-sample-results>>

www.alisoupdates.com

The California Office of Environmental Health Hazard Assessment (OEHHA) has completed an assessment of six weeks of air samples taken from areas around the Aliso ...

Nathan and I spoke today with the HHS SOC as well as Mark Young who is one of the Region 9 ECs. They have not received any requests for assistance from the State or locals. Likewise I spoke with Bill Rich who is the Senior Emergency Coordinator for the CDC's National Center for Environmental Health. He also confirmed that CDC has not received had not received any requests for assistance from the state or locals. There had been a previous RFI on the 18th, again to ask whether CDC had received any requests for assistance. ATSDR has an LNO imbedded with the EOC for situational awareness. He thought that EPA also had an LNO imbedded.

I've been asked to confirm that EPA is aware and monitoring—why I am coming to you. I also providing you with a PHMSA POC (copied) should have a need to speak with someone from that Administration.

Nathan A. Schoenkin

Compliance Specialist

Emergency Support & Security

Pipeline and Hazardous Materials Safety Administration

Office: 202-366-4774

Cell: 202-740-1978

E-mail: nathan.schoenkin@dot.gov<<mailto:nathan.schoenkin@dot.gov>>

I've included my notes from yesterday's call with some background info that I put together for my management. Should you have questions, please feel free to contact me on my cell (below).

Thanks in advance....

Lynn

CAPT Lynn A. Slepiski, PhD, RN, PHCNS-BC, FAAN

Senior Public Health Advisor

Office of Intelligence, Security and Emergency Response

Office of the Secretary of Transportation

Desk (202) 366-0533

Cell (202) 236-6773

From: Slepiski, Lynn A (OST)

Sent: Tuesday, December 29, 2015 3:26 PM

To: Moore, Richard (OST); Hinz, Deborah (OST)

Cc: O'Berry, Donna (OST); Slepiski, Lynn A (OST)

Subject: Aliso Canyon Methane Leak

Importance: High

SoCalGas call convened by Jeff Salizar at 0900 local (noon)

- OPS (Jimmy Cho). They are prepping for next week's storm effects for incoming storm
 - o SS25 (2nd relief well). Making progress down ~ 2000 feet. May be delayed because of storm.
 - o NOTE: No definitive mitigation or remediation "plan" referenced on website.

- COMMS (Anne)
 - o CAC (?) meeting tonight
 - o LA Unified School District meeting to discuss return to school scheduled for Jan 11 (which is pretty late).
- NOTE: Nathan believes that 2 schools have been relocated. Confirmed in KTLA media report as Castlebay Lane and Porter Ranch Community Schools.
 - o Relocation center has received 7,100 calls (unclear over what time frame—event began Oct 23)
 - o 2,292 in (or have accepted) temporary housing
 - o 3,660 pending relocation

- ENV/Health (Jill)
 - o Air monitoring continuing
 - o Data uploaded yesterday
 - o Continuing to "correct" data and new data should be updated later this morning
 - o 3 PM call today to discuss revised air quality monitoring plan
 - o HMZ meeting Jan 9

- Q&A
 - o LA OEM asked if they could be included in Methane capture meeting on Thursday. To date only fire captain was invited—yes
- In person meeting, but will be adding phone lines

- o LA PH. May be unable to provide comment on proposed changes to air quality monitoring
- o LA PH. They have a handful of people experiencing odors and symptoms, but are outside of zipcode catchment area in the "Chatworth" section (apparently in a hilly terrain). They have attempted to get services, but have been denied – Send them over. We'll get them connected. Do they want air purification or temporary housing?

Call ended at 12:18. Next call scheduled for tomorrow morning.

I spoke with Nathan again. He had been instructed to contact HHS when the incident occurred. He spoke with the SOC and was told they were not involved. He also contacted EPA and was told that because there were no immediate health effects, that they are not getting involved.

BACKGROUND:

- o Leak discovered on Oct 23 from an underground well of the Aliso Canyon storage facility in the Santa Susana Mountains. It is one of four storage facilities in Southern California
- o Aliso Canyon opened in 1972 and uses a 7-inch pipe that descends 8,500 feet to a natural gas deposit underground.
- o SoCalGas has been in operation 140 years. It is the nation's largest natural gas distribution utility, providing service to 21.4 million consumers connected through 5.9 million meters in more than 500 communities. The company's service territory encompasses approximately 20,000 square miles throughout central and Southern California, from Visalia to the Mexican border. Southern California Gas Co. is a regulated subsidiary of Sempra Energy<<http://sempra.com/>> (NYSE: SRE), a Fortune 500 energy services holding company based in San Diego.
- o The storage site is spilling 1,200 tons of methane each day. (Estimated 800,000 metric tons had been spewed by Nov 20th).
- o SoCal states the well is more than 1 mile away and 1,200 feet in elevation above the nearest homes in the Porter Ranch area. "Methane level readings in Porter Ranch are substantially lower than flammable limits, and do not pose a health concern to residents in the area."
- o Methane is a major greenhouse gas, and the well is contributing about a quarter of the state's total output of methane.
- o Per LA County Department of health fact sheet "Exposures to these chemicals are generally not expected to lead to permanent or long-term health problems," fact sheet<<https://www.socalgas.com/documents/news-room/aliso-canyon-health-fact-sheet-112415.pdf>> in November.
- o On Dec 11, FAA has placed a TFR over the well site which extends to March 8, 2016 (half-mile radius of the site , up to 2,000 feet above the surface. SoCal saying that it was requested to stop distractions by overflying planes to the well workers. However they quote an FAA spokesman email from Allen Kenitzer that he believed the order was requested "out of concerns that fumes from the gas leak could be ignited from the air."

- o SoCal Gas is the largest gas distributor in the county. <https://www.alisoupdates.com/main>
- o They are offering customers air purification and weatherization services to local residents in the 91326 zip code to help with the odor problem. They are working with a licensed Heating Ventilation and Air Conditioning (HVAC) contractor to provide whole-house air purification by replacing the standard air filter(s) in HVAC systems with a specially designed activated carbon filter that can remove the compounds found in natural gas and its odorant from the air in customer homes.
- o They are also offering to reimburse for certified California Air Resources Board approved systems if homeowners want to purchase on their own.
- o They are also offering providing free, temporary housing accommodations, including locations that can accommodate residents with disabilities and people with access and functional needs. And for residents with pets, they have arranged pet-friendly locations.
- o They intent to stop using the well after the leak is fixed. They caution that it could take months to stop the seepage.
- o SoCalGas is also working with some of the world's most experienced engineering firms to develop innovative approaches to capturing the gas that is escaping from the leak. Currently Boots and Coots is on site.
 - * The relief well has advanced, on-schedule, into the second of five operational phases and could be completed by late-February to late-March. Once completed, SoCalGas will use the relief well to pump fluids and cement into the bottom of the leaking well to permanently seal it.
 - * A second relief well site is being prepared as a backup operation.
 - * The option to conduct additional efforts to pump fluids directly down the well to stop the flow of gas remains available, and further attempts to do so could be conducted in the coming week.
 - * SoCalGas is withdrawing gas from the storage facility to decrease the pressure pushing gas out through the leak. The company has prioritized the use of gas from Aliso Canyon to supply customer demand and, as a result, is withdrawing natural gas from the field at about double the typical rate for this time of year.
 - * SoCalGas opened its Porter Ranch Community Resource Center Dec. 16 in the Porter Ranch Town Center, 19731 Rinaldi Street, to provide services and information to the community
- o LA Public Health has said that the leak is NOT a threat to public health, but hundreds of residents have complained of nausea, headaches, bloody noses and other maladies.
- o The company and state officials say illnesses are caused by the foul-smelling additive that makes odorless natural gas detectable.
- o ABC News article Dec 16 <http://abcnews.go.com/US/wireStory/emergency-declaration-gas-leak-35804863> said that the company has paid to relocate 1,675 households in temporary accommodations and is working at moving another 1,200 households.
- o Company has said it will take 3 to 4 months to drill a secondary well that will be used to stop the leak
- o On December 15, LA County declared a state of emergency over a leaking natural gas well above a neighborhood that forced a utility company to relocate thousands of residents who said that the stench had made them sick.
- o December 18 SoCalGas President and CEO Dennis V. Arriola sent a letter to Calif. Gov. Jerry Brown confirming the company's commitment to work with state officials to develop a framework that will help guide the company's efforts to mitigate environmental impacts from the actual natural gas released from the leak at Aliso Canyon – even before the

actual amount of the leaked volume is determined. A comprehensive inventory of emissions will be taken after the leak has been stopped.

o Erin Brockovich and Robert F. Kenney are in the area holding public events discussing potential long term health effects. News media is reporting public protests.

KTLA spill webpage <http://ktla.com/search/methane+leak/feed/rss2/>

SoCalGas Emergency webpage <https://www.socalgas.com/stay-safe/emergency-information/emergency-response>

SoCalGas Aliso Canyon Updates Web Page <https://www.alisoupdates.com/main>

SoCalGas Methane Emissions Map <https://www.socalgas.com/stay-safe/methane-emissions/methane-emissions-map>

SempraEnergy Aliso Canyon webpage <http://sempra.mediaroom.com/index.php?s=19080&item=137102>

Sempra Energy <http://sempra.com/>

LA Daily news <http://www.dailynews.com/environment-and-nature/20151215/la-county-declares-state-of-emergency-over-porter-ranch-gas-leak>

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United States Environmental Protection Agency

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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MEMORANDUM

MAP. - 6 2006

OFFICE OF
GENERAL COUNSEL

TO: Granta Nakayama
Assistant Administrator
Office of Enforcement and Compliance Assistance

Susan Bodine
Assistant Administrator
Office of Solid Waste and Emergency Response

Regional Administrators, Regs. I-X

Regional Counsel, Regs. I-X

FROM: Ann R. Klee 
General Counsel

SUBJECT: Applicability of Clean Air Act Section 112(r)(1) General Duty Clause and Section 112(r)(7) Risk Management Program to Liquefied Natural Gas Facilities

A number of EPA regions are involved in the review and licensing of proposed on- and off-shore liquefied natural gas (LNG) distribution facilities. The Office of General Counsel (OGC) has been working with regional and headquarter offices to coordinate the Agency's response to legal issues raised by these facilities. An issue that has arisen is the applicability of the "general duty clause" of Clean Air Act (CAA) section 112(r)(1) and the Risk Management Program (RMP) regulations under CAA section 112(r)(7). The purpose of this memorandum is to clarify that the language of the statute and the legislative history demonstrate that Congress did not intend the general duty clause and the RMP regulations to apply to LNG facilities to the extent they transport, or store incident to transportation, extremely hazardous substances, including methane.¹ This memorandum supercedes all previous memoranda and opinions on this topic.

¹ LNG facilities at which "extremely hazardous substances" are present for reasons other than transportation or storage incident to transportation are subject to the general duty clause with respect to those substances. LNG facilities at which substances listed under CAA section 112(r)(3) are present in more than threshold quantities for reasons other than transportation or storage incident to transportation are subject to the RMP regulations with respect to those substances. Thus, for example, a LNG facility that stores ammonia for use at the terminal above the applicable threshold would be subject to the general duty clause and the RMP for the ammonia it stores.

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Statutory Background

CAA section 112(r) establishes a two-tier system for preventing accidental releases of “extremely hazardous substances” from “stationary sources.” The section 112(r)(1) general duty clause requires stationary sources storing or using any extremely hazardous substance to identify hazards associated with such substance and design and maintain a safe facility. RMP regulations under section 112(r)(7) require stationary sources having more than a “threshold quantity” of a “regulated substance” to develop and implement “risk management programs” and submit “risk management plans” describing those programs. “Regulated substances” are the chemicals identified by EPA under section 112(r)(3) as posing the greatest risk to public health and the environment in the event of an accidental release.

Both section 112(r)(1) and section 112(r)(7) apply to “stationary sources.” Section 112(r)(2)(C) defines “stationary source” for the purpose of section 112(r) as “any buildings, structures, equipment, installations or substance emitting stationary activities (i) which belong to the same industrial group, (ii) which are located on one or more contiguous properties, (iii) which are under the control of the same person (or persons under common control), and (iv) from which an accidental release may occur.” This definition is similar but not identical to other CAA definitions of “stationary source.”

The legislative history of section 112(r) indicates that Congress did not intend the term “stationary source” to include transportation facilities (*e.g.*, LNG facilities) for purposes of either section 112(r)(1) or section 112(r)(7). Members of the Conference Committee for the Clean Air Act Amendments of 1990, which added section 112(r), stated that “[t]he conferees do not intend the term ‘stationary source’ to apply to *transportation, including the storage incident to such transportation*, of any regulated substance or other extremely hazardous substance under the provisions of this subsection,” referring to section 112(r). Joint Explanatory Statement of the Committee of the Conference at 340 (emphasis added).²

Section 112(r) provides both discretionary and mandatory regulatory authority. Under section 112(r)(7)(A), the Agency “is authorized” to issue “release prevention, detection, and correction requirements” that “may make distinctions between various types, classes, and kinds of facilities.” Section 112(r)(7)(B)(i), by contrast, requires EPA to issue regulations “to provide,

² This conference statement is particularly enlightening given the scope of the Senate’s original version of 112(r), which sought to apply 112(r) to the “broadest set of activities . . . including, but not limited to, *transportation . . . activities*” (emphasis added). The conference made it clear that it was adopting a position contrary to the Senate’s original version.

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to the greatest extent practicable, for the prevention and detection of accidental releases of regulated substances and for response to such releases. . . .” It further stipulates that “[t]he regulations shall cover storage.” The regulations must meet other criteria set forth in section 112(r)(7)(B)(ii), which provides, among other things, that the “regulations . . . shall require the owner or operator of stationary sources at which a regulated substance is present in more than a threshold quantity to prepare and implement a risk management plan to detect and prevent or minimize accidental releases of such substances from the stationary source”

Regulatory History

In 1994, EPA issued a rule under section 112(r)(3) listing toxic and flammable chemicals as “regulated substances” for purposes of the regulations EPA was required to issue under section 112(r)(7)(B). As part of that rulemaking, EPA promulgated a definition of “stationary source” that excluded “transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under [specified DOT regulations regulating LNG terminals and pipelines].” 59 Fed. Reg. 4478, 4493 (January 31, 1994). EPA explained in the rule’s preamble that “[f]or purposes of regulations under section 112(r), the term stationary source does not apply to transportation conditions, which would include storage incident to such transportation, of any 112(r) regulated substance. Pipelines, transfer stations, and other activities already covered under DOT as transportation of hazardous substances by pipeline, or incident to such transportation [under the specified regulations] would not be covered.” *Id.* at 4490.

In 1996, EPA proposed to revise the definition to clarify that exempt transportation includes, but is not limited to, transportation activities subject to the DOT regulations specified in the promulgated definition. The Agency explained that it “intended to exclude from the definition of stationary source all transportation and storage incident to transportation to be consistent with EPCRA [the Emergency Planning and Community Right-to-Know Act].” 61 Fed. Reg. 16,598, 16,601 (April 15, 1996). The Agency viewed CAA section 112(r) as an extension of EPCRA, which excludes transportation and storage incident to transportation. *See, e.g.*, 58 Fed. Reg. 5,102 (January 19, 1993). The legislative history of section 112(r) confirms that Congress considered section 112(r) as building on EPCRA’s requirements that covered facilities inform local and state officials of extremely hazardous chemicals at the facilities and that local and state officials plan for responding to a release of those chemicals. *See, e.g.*, S. Rept. 101-228 at 250.

In 1998, EPA promulgated a revised definition of “stationary source” that remains in effect today. 63 Fed. Reg. 640, 642-43 (January 6, 1998). It clarified, among other things, that the exemption for regulated substances in transportation, or in storage incident to such

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transportation, is not limited to LNG terminals and pipelines subject to the DOT regulations cited in the definition. *Id.* at 642. One commenter on the proposed rule noted that in proposing to revise the definition to more broadly exclude transportation, including storage incident to transportation, EPA was “following the wishes of Congress,” citing the legislative history discussed above. The commenter requested that EPA provide a written confirmation of its interpretation of congressional intent. EPA responded as follows:

EPA agrees that the exclusion of transportation and storage incident to transportation from the definition of stationary source is consistent with Congressional intent. The definition of stationary source that EPA is promulgating reflects the language of the Congressional report quoted by one of the commenters.

List of Substances and Thresholds for Accidental Release Prevention; Proposed Amendments: Summary and Response to Comments (hereinafter RTC), December 1997, p. 21.

In 1996, EPA issued its RMP regulations under section 112(r)(7)(B), thereby discharging its mandatory duty to issue regulations under that provision. The RMP regulations added the substantive requirements that apply to “stationary sources,” as defined by the list rule, at which “regulated substances” are present above applicable threshold quantities. When the “stationary source” definition was revised in 1998, it clarified the scope of the RMP regulations.

Regulation of LNG Facilities

On-shore LNG facilities are subject to Department of Transportation (DOT) safety standards. *See* 49 C.F.R. part 193 (Liquefied Natural Gas Facilities: Federal Safety Standards); 33 C.F.R. part 127 (Waterfront Facilities Handling Liquefied Natural Gas and Liquefied Hazardous Gas). DOT’s regulations comprehensively prescribe safety, design, siting, construction, equipment, operations, maintenance, training, fire protection, and security requirements for all on-shore LNG facilities. LNG facilities must be designed and located to minimize the hazards to persons and offsite property resulting from leaks and spills of natural gas. In particular, on-shore LNG facilities must have a “thermal exclusion zone” around the facility, which is determined by conducting modeling using parameters specified by DOT (analogous to EPA’s off-site consequence analyses).

Off-shore LNG facilities are regulated by DOT’s Maritime Administration (MARAD) and the Coast Guard under the Deepwater Port Act and the Maritime Transportation Security Act of 2002 (MTSA). *See* 33 U.S.C. § 1503; 46 U.S.C. § 210; 33 C.F.R. parts 148, 149, and 150. Off-shore facilities currently are subject to “interim” regulations. These regulations contain

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standards for facility licensing, siting, construction, design, operations, inspection, personnel training and qualifications, vessel navigation and safety zones, fire protection, emergency plans and operations, and workplace safety and health. The MTSA mandates that permanent standards be adopted "as soon as practicable." The Coast Guard expects to finalize permanent standards in 2006.

Analysis

A. Clean Air Act Section 112(r)(7) RMP Regulations Do Not Apply to On- or Off-shore LNG Facilities

EPA has expressly provided that the RMP regulations do not apply to on-shore LNG facilities to the extent they transport or store incident to such transport regulated substances. In 1996, EPA defined "stationary source," the legal prerequisite for being subject to the RMP regulations, as "excluding transportation, including storage incident to transportation, provided such transportation is regulated under 49 CFR part 192, 193, or 195. . . . as well as transportation subject to natural gas or hazardous liquid programs for which a state has in effect a certification under 49 U.S.C. section 60105." 61 Fed. Reg. at 16,601. In 1998, EPA clarified that the "transportation exemption" was not limited to just sources regulated by DOT, but included transportation and storage incident to transportation generally. 63 Fed. Reg. at 642. It also reiterated that the exemption "applies to liquefied natural gas (LNG) facilities subject to [DOT] oversight or regulation . . . or a state natural gas or hazardous liquid program." *Id.* EPA made clear that it promulgated such a definition of "stationary source," *i.e.*, one that excludes transportation and storage incident to transportation, including LNG facilities, to be "consistent with Congressional intent." *See* RTC at 21. As discussed in greater detail below, EPA did not suggest that it was narrowly interpreting the statutory definition of "stationary source" for RMP regulatory purposes.

The above-cited preamble discussions addressed on-shore LNG facilities only; at the time there were no existing or proposed off-shore LNG facilities. The revised definition of "stationary source" and the accompanying preamble discussions, however, make clear that off-shore LNG facilities also qualify for the transportation exemption and thus are not subject to the RMP regulations. Consistent with Congress's express intent to exempt all transportation facilities from 112(r), EPA broadened the transportation exemption to all transportation, including storage incident to transportation. There is no doubt that off-shore LNG facilities are transportation facilities, since they are functionally equivalent to on-shore LNG facilities. Although off-shore facilities are not subject to 49 C.F.R. parts 192, 193, or 195, as discussed above, they are subject to comprehensive regulation by MARAD and the Coast Guard. *See* 33 C.F.R. parts 148, 149, and 150. Thus, there is no legal or policy reason to subject off-shore LNG facilities to the RMP

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regulations.

B. Clean Air Act 112(r)(1) General Duty Clause Does Not Apply to On- or Off-shore LNG Facilities

1. Congress unambiguously exempted transportation facilities from the definition of “stationary source”

As discussed above, Congress expressed its intent that “‘stationary source’ not apply to transportation, including the storage incident to transportation, of any *regulated substance or other extremely hazardous substance* under the *provisions*” of section 112(r) (emphasis added). The conference’s use of the phrase “provisions of section 112(r)” indicates that it intended to exempt transportation facilities from all of section 112(r), not just 112(r)(7). Had Congress intended to exempt transportation facilities only from certain subsections or subparagraphs, presumably it would have said so. Elsewhere in the CAA and its legislative history, Congress made such distinctions.

The Committee’s reference to “any regulated substance *or other extremely hazardous substance*” (emphasis added) further evidences that it was addressing section 112(r) generally, not just the section 112(r)(7)(B) RMP program. Section 112(r)(7)(B) applies only to the more limited universe of “regulated substances,” whereas other section 112(r) provisions, including section 112(r)(1), apply to both “regulated substances” and “other extremely hazardous substances.” Had Congress not intended to exempt transportation facilities from the entirety of section 112(r), or, stated differently, had it intended to exempt such facilities only from the RMP regulations, it would not have referenced “other extremely hazardous substances,” since 112(r)(7)(B) regulates only “regulated substances.”

Taken together, the Conference Committee’s references to “provisions of section 112(r)” and “extremely hazardous substances,” demonstrate unequivocally that Congress intended to exempt transportation facilities from 112(r) generally, including the 112(r)(1) general duty clause.

2. Because LNG facilities are not “stationary sources,” they cannot be subject to either the “general duty” clause or the RMP regulations

Section 112(r)(7)(B) and section 112(r)(1) both apply to “stationary sources,” and section 112(r)(2)(C) defines “stationary source” for purposes of section 112(r) generally. Neither section 112(r)(7)(B) nor section 112(r)(1) authorizes EPA to narrow the meaning of “stationary source” as it is used in that provision. Section 112(r)(7)(B) requires EPA to regulate only those “stationary sources” having more than a threshold quantity of a regulated substance, but the

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statutory definition of "stationary source" otherwise governs the applicability of the regulations. Section 112(r)(1) directly imposes a general duty of care on "stationary sources" with no narrowing of the universe of covered facilities. In implementing both section 112(r)(7)(B) and section 112(r)(1), EPA is thus applying the statutory definition of "stationary source."

Under standard rules of statutory construction, the Agency's ability to interpret the statutory definition of "stationary source" one way for section 112(r)(7)(B) and another way for section 112(r)(1) is limited. For EPA to adopt different interpretations of "stationary source" for different provisions of section 112(r), there must be statutory support for different interpretations and a reasonable explanation for the difference. No such support or explanation exists here. Nothing in the statute or its legislative history suggests that Congress intended "stationary source" as defined by section 112(r)(2)(C) to be interpreted differently for different provisions of section 112(r). In fact, as discussed above, the legislative history indicates just the opposite.

Moreover, in promulgating, and later revising, the regulatory definition of "stationary source," EPA did not suggest that it was narrowly interpreting the statutory definition of that term for purposes of the RMP regulations. The Agency explained that excluding transportation and storage incident to transportation would make CAA section 112(r) consistent with EPCRA, its legislative antecedent. In response to a commenter, EPA expressly acknowledged that the regulatory definition of "stationary source" was consistent with congressional intent. EPA provided no explanation of why, as a policy matter, transportation and storage incident to transportation should be excluded from the RMP regulations and not from the other provisions of section 112(r), including the general duty clause.

Presumably, such an explanation would have been critical in light of the section 112(r)(7)(B) requirements that the RMP regulations cover "storage" and "provide, to the greatest extent practicable" for the prevention and mitigation of accidental releases from "stationary sources." A regulatory definition of "stationary source" that excluded transportation and storage incident to transportation arguably would have been inconsistent with those statutory directives, and thus would have required a reasoned explanation to provide an adequate basis for the regulatory exemption. The only explanation EPA gave of the legal basis for the regulatory definition of "stationary source" was that it is consistent with congressional intent as revealed in legislative history. Thus, there is no basis in the rulemaking record of the RMP regulations to suggest now that EPA intended to narrowly interpret the statutory definition of "stationary source" only for regulatory purposes.³ As such, the Agency cannot now advance such an

³ Thus, this situation is distinguishable from the Resource Conservation and Recovery Act (RCRA) context in which EPA defined the term "solid waste" for regulatory purposes more

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DELIBERATIVE DOCUMENT
ATTORNEY-CLIENT COMMUNICATION**

argument simply to support an effort to justify subjecting LNG facilities to the 112(r) general duty clause. Even assuming that the CAA afforded EPA the discretion to define "stationary source" differently for purposes of sections 112(r)(1) and 112(r)(7), the Agency would have to undertake rulemaking to accomplish what effectively would be a reversal of its initial interpretation of section 112(r)(C)(2).

Conclusion

To the extent LNG facilities transport, or store incident to transport, regulated substances or extremely hazardous substances, they are exempt from CAA section 112(r), including the section 112(r)(1) general duty clause and the section 112(r)(7) RMP regulations. The legislative history of section 112(r) is clear that Congress intended to exclude from the statutory definition of "stationary source," and thus from regulation under 112(r) generally, facilities, like LNG facilities, that transport, or store incident to such transport, extremely hazardous substances. If you have any questions, please call me, Chet Thompson, or Nancy Ketcham-Colwill of my staff.

narrowly than the statutory definition. *See* RCRA § 1004(27) and 40 C.F.R. pt 261.2. In that situation, EPA was exercising its regulatory discretion to more narrowly define a statutory term for regulatory purposes. Here, by contrast, EPA adopted for regulatory purposes the statutory definition of stationary source. Had EPA adopted a regulatory definition of stationary source that included transportation facilities, it would have effectively expanded the statutory definition, not narrowed it.

MEMORANDUM

**SUBJECT: Southern California Gas Company Methane Gas Release
Aliso Canyon Natural Gas Storage Facility**

**FROM: Jared Blumenfeld
Regional Administrator, Region 9**

**TO: Matthew Fritz
Chief of Staff**

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in Los Angeles County. SoCal Gas injects natural gas into abandoned oil reservoirs for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Energy Utilities.

The Aliso Canyon storage facility contains 115 gas withdrawal/injection wells. The leaking well is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet), the second largest natural gas storage facility in the United States.

Porter Ranch, an residential community of approximately 30,000 people, is located 1 mile away. More than 1,800 families have been relocated by the gas company and 1,000 remain on a waiting list. Two local elementary schools with nearly 2,000 schoolchildren and staff are slated to be moved to other schools in January.

Current Status: SoCal Gas is the responsible party and is attempting to plug the leaking well with a team of well-control contractors. SoCal Gas is working to kill the well from the top and drilling relief wells to kill the well from the bottom. SoCal has 157 people in their Incident Action Plan working on this relief effort.

SoCal Gas has attempted multiple 'top kill' operations, none successful. They are concerned about degrading the integrity of the well bore. The next effort will pump material such as ball bearings in heavy mud down the wellbore in an attempt to stop the flow of gas.

SoCal Gas is drilling two relief wells. The relief well, if successful, will intercept the bottom of the leaking well and pump in cement. This technique has had great success in controlling blow outs. The drilling operation continues around the clock and the relief wells are estimated to take 3-4 months to complete.

Environmental and Public Health Issues: Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels substantially below the flammability limit and that do not represent an acute health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness. Residents have reported effects consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing health effects to some Porter Ranch residents and is requiring that SoCal Gas provide temporary relocation “As the duration of exposure increases, these trace levels can produce significant long-term health effects,” said Department of Public Health Interim Director Cynthia Harding. “As this incident has moved from a short-term exposure event resolved within days, to now a long-term event potentially lasting months, supplemental monitoring of potentially harmful trace chemicals is warranted.”

Regulatory Actions:

State Agencies: Division of Oil, Gas and Geothermal Resources (DOGGR), Department of Conservation, Natural Resources Agency; California Public Utility Commission (CPUC); California Office of Emergency Services (OES); California Environmental Protection Agency (Cal/EPA).

Local Agencies: Los Angeles County Certified Unified Program Agency (LA County CUPA) Los Angeles County Fire/HazMat; City of Los Angeles; South Coast Air Quality Management District (SCAQMD); Los Angeles County Department of Public Health

DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas’s plans for stopping the leak.

The CPUC is conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root-cause analysis of the well blow-out.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1st, 778 households had either relocated (282) or were in

the process of relocating (496). SoCal Gas has established a community center in Porter Ranch to answer questions and assist residents with temporary relocation and claims.

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency group with expertise in plume and atmospheric modeling.

Federal Actions:

The Region is participating in daily operational calls and providing daily summaries. On 15 December, two on-scene coordinators participated in a site tour with the Los Angeles County Fire and Hazardous Materials Unit and Lawrence Livermore National Laboratory. The most direct federal authority is held by the Department of Transportation, Office of Pipeline and Hazardous Materials Safety Administration. However the DOT authority has been delegated to California and it is not clear what action DOT is willing to take in this case.

[REDACTED]

[REDACTED]

On 18 December the Region issued an information request to SoCal Gas pursuant to the Clean Air Act Section 114.

Congressional Interest:

Region 9 is drafting a response to a letter from Congressman Sherman who is requesting an active EPA role in the response. We have also responded to inquiries from Senator Boxer's office.

[REDACTED]

Proboszcz, Angie

From: Meer, Daniel
Sent: Monday, January 04, 2016 3:53 PM
To: Richman, Lance
Cc: Lawrence, Kathryn
Subject: RE: Aliso Canyon Coordination

Follow Up Flag: Follow up
Flag Status: Flagged

Yes, let's see who we can pull in from Lawrence Livermore for item 3. This incident specific all can happen any time, it does not have to be at the meeting.

Let's see if LA County Bill Jones or one of his people can help brief out the Aliso canyon situational awareness at the RRT meeting, for item 2

Daniel A. Meer, Assistant Director
Superfund Division
Emergency Response, Preparedness and Prevention Branch
415.972.3132 (O)
415.971.6792 (C)

From: Richman, Lance
Sent: Monday, January 04, 2016 3:40 PM
To: Meer, Daniel
Cc: Lawrence, Kathryn
Subject: RE: Aliso Canyon Coordination

Ok, so where do we go here?

1) I got it, no Sempra Energy/SoCalGas engagement

2) Time at the RRT for Dan brief-out (or do you want me to pull in a state/local agency for the brief?)

3) Move ahead with the Incident Specific call and bring in expertise in gas deep well injection, extraction, and blow out prevention.

Is that where we want to go on this?

Lance

Lance Richman
Superfund Programs
U.S. EPA Pacific Southwest Region
75 Hawthorne St. SFD 9-3
San Francisco, CA 94105
Phone on TWT: 1.415.972.3022 (office voicemail)
Phone on MF: 1.510.627.7710 (alternate workspace)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On Jan 4, 2016, at 2:15 PM, Richman, Lance <Richman.Lance@epa.gov> wrote:

Dan: Understood. Will work to get some gas field/well expertise in the mix to include DOE.

I do have a POCs in Sempra Energy (parent company of SoCalGas); you and Kay may recall I attended a TTX exercise last year with them so I know some of the players. Would you like them to present on the event?

Lance

Lance Richman
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San Francisco, CA 94105
Phone on TWT: 1.415.972.3022 (office voicemail)
Phone on MF: 1.510.627.7710 (alternate workspace)
24 Hour Oil Spill Response: 1.800.424.8802

From: Meer, Daniel
Sent: Monday, January 04, 2016 2:04 PM

To: Richman, Lance <Richman.Lance@epa.gov>

Cc: Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>; Timothy.P.Holmes@uscg.mil

Subject: FW: Aliso Canyon Coordination

Lance – I will need some time on the agenda next week to brief out on the Aliso Canyon methane leak. I also want to convene an incident specific RRT call, just for situational awareness for DOT, DOE and DOI.

Ideally I would like to have representatives from the national labs on that call. Enrique and I have also reached out to Reggie Cheatham to see if we can convene something on the national level but I am not sure it will get traction. We'll see. Can you reach out to our DOE rep and see how feasible it is to get some participation from Lawrence Berkeley or Lawrence Livermore or Sandia national labs. We need expertise in deep well injection, extraction, blow out prevention etc.

Thanks, Dan

Daniel A. Meer, Assistant Director
Superfund Division
Emergency Response, Preparedness and Prevention Branch
415.972.3132 (O)
415.971.6792 (C)

From: nathan.schoenkin@dot.gov [<mailto:nathan.schoenkin@dot.gov>]

Sent: Monday, January 04, 2016 1:31 PM

To: Meer, Daniel

Cc: Manzanilla, Enrique; Lawrence, Kathryn; David.Lehman@dot.gov; david.murk@dot.gov

Subject: RE: Aliso Canyon Coordination

Dan,

It was a pleasure speaking with you as well. We would definitely be interested in participating in an incident specific NRT/RRT meeting on the Aliso Canyon incident. My boss David Lehman would be the primary for the call, and David Murk would be the secondary. They have been cc'd on this email.

Please let me know how the EPA chair responds to this.

Thank you,

Nathan A. Schoenkin
Compliance Specialist
Emergency Support & Security
Pipeline and Hazardous Materials Safety Administration
Office: 202-366-4774
Cell: 202-740-1978
E-mail: nathan.schoenkin@dot.gov

From: Meer, Daniel [<mailto:Meer.Daniel@epa.gov>]

Sent: Monday, January 04, 2016 4:05 PM

To: Schoenkin, Nathan (PHMSA)

Cc: Manzanilla, Enrique; Lawrence, Kathryn

Subject: Aliso Canyon Coordination

Nathan – nice talking to you. Please do let me know what your upper management thinks about convening an incident specific NRT meeting on the Aliso Canyon incident. I will raise it with the EPA chair of the NRT as well.

It would be useful to get the federal family in good communication and more specifically, to reach out to experts beyond EPA and DOT – for example the national labs under DOE and DOI, that might have some expertise in well injection and blow out control.

Regards, Dan Meer

Daniel A. Meer, Assistant Director
Superfund Division
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Proboszcz, Angie

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Subject: Re: Aliso Canyon Coordination

Follow Up Flag: Follow up
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Yes just to be clear, we need the federal family to be in good coordination, b/c EPA will be asked our opinion on the gas capture proposal, as an example.

Without an advisory body of experts from the national labs and PHSMa it will be tough to answer questions like that.

Dan
Sent from my iPhone
Daniel Meer
Assistant Director
Superfund Division
USEPA, Region 9

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Thanks, Dan

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Superfund Division
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Proboszcz, Angie

From: Meer, Daniel
Sent: Wednesday, December 16, 2015 12:42 PM
To: Manzanilla, Enrique; Lawrence, Kathryn; Allen, HarryL; Johnstone, Jeremy
Cc: Lindsay, Nancy; Irizarry, Gilberto; Schumann, Jean; Lee, Eugene; Zabel, Allan
Subject: RE: Alison Canyon Situational Update
Attachments: Aliso Canyon Update 12.16.docx

Follow Up Flag: Follow up
Flag Status: Flagged

[Use this version.](#) Dan

Daniel A. Meer, Assistant Director
Superfund Division
Emergency Response, Preparedness and Prevention Branch
415.972.3132 (O)
415.971.6792 (C)

From: Meer, Daniel
Sent: Wednesday, December 16, 2015 12:33 PM
To: Manzanilla, Enrique; Lawrence, Kathryn; Allen, HarryL; Johnstone, Jeremy
Cc: Lindsay, Nancy; Irizarry, Gilberto; Schumann, Jean; Lee, Eugene
Subject: Alison Canyon Situational Update

Update for 16 December 2015. New information is shaded yellow.

Dan

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PRE DECISIONAL – ATTORNEY CLIENT PRIVILEGE – DO NOT RELEASE

Southern California Gas Company Methane Release

Aliso Canyon Natural Gas Storage Facility

16 December 2015

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in the northern San Fernando Valley, Los Angeles County. SoCal Gas injects natural gas into the abandoned oil reservoir for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Utilities.

The Aliso Canyon storage facility is located near Porter Ranch, an affluent residential community of approximately 30,000 people. The nearest Porter Ranch residents that are being affected live approximately 1 mile away and 1200 feet below the leaking wellhead.

The Aliso Canyon facility contains 115 gas withdrawal/injection wells and the well that is leaking, Well SS 25, is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet) of natural gas, one of the largest storage facilities in the United States.

Levels of methane, the principal component of natural gas, are being monitored in the residential areas and currently do not represent a significant public health threat.

Current Status:

Well Head Prep: Work continues on preparing a walkway to allow safe access to the well head. They are building a 100 foot bridge for this purpose. High northerly winds are making it difficult to run equipment to the wellhead, so progress is slow.

Relief Wells: Relief well is on schedule and is currently drilled to 3850'. Casing is in the ground, cemented and logged, to approximately 1845'. There were some anomalies on the well log and the cemented section will be re logged. A second relief well site has been identified and grading has begun to prepare the drill pad.

Kill Shot Prep: They continue grading the well pad and bringing in equipment for the next 'top kill' attempt. This includes pumps and the heavy mud that they plan to pump into the well.

Pressure Regulation: SoCal Gas continues to withdraw gas from the facility at approximately 1 bcf/day to reduce pressure around SS-25. The top hole pressure is estimated at 1420 psi and bottom hole pressure is estimated at 1800 psi.

SoCal Gas Company has a team of well control experts that are attempting to plug the leaking well. However complex geology of the area is complicating the effort. SoCal Gas is currently

drilling two relief wells that will be used to divert gas flow away from the leaking well, and subsequently heavy muds and fluid will be pumped into the leaking well, to stop the methane release (bottom kill). The leaking well will then be permanently plugged with cement. The drilling operation continues around the clock and the relief well effort is estimated to take 3-4 months to complete. SoCal Gas is also preparing for a 'top kill' attempt, possibly early next week. They have attempted several top kills without success.

Environmental and Public Health Issues: Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels that are substantially below the flammability limit and that do not represent a current health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness and residents have reported effects that are consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing a health effects to some Porter Ranch residents.

Regulatory Actions: A large group of state and local regulatory agencies and jurisdictions are involved with the response to this methane leak.

State Agencies:

Division of Oil, Gas and Geothermal Resources, Department of Conservation,
Natural Resources Agency

California Office of Emergency Services;

California Environmental Protection Agency.

Local Agencies:

Los Angeles County Certified Unified Program Agency (LA County CUPA)

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The Natural Resources Agency, DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas's plans for stopping the leak.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1st, 778 households had either relocated (282) or were in the process of relocating (496). SoCal Gas has established a

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency with expertise in plume and atmospheric modeling.

Next Steps:

OSCs Moxley and Musante attended a site tour on 12/16 with LA County Fire/HazMat, Lawrence Livermore National Laboratory and the California Department of Conservation.

The Region's CAA 114 information request should be ready for signature by COB 12/17.

The Region is holding daily situational update calls during the work week, starting on 12/17, at 1100 Pacific time. The Region is also participating in the daily ops call with SoCal Gas.

The Emergency Response, Preparedness and Prevention Branch has assigned an on-scene coordinator and an emergency preparedness and prevention inspector to sit in on the daily operational calls and provide daily summaries. We will develop a staffing plan that will describe how we might bring USEPA assets to assist, if we get a request from California.

[REDACTED]

On 16 December two OSCs will participate with California agencies (DOGGR, Department of Conservation) and representatives from the National Labs (Lawrence Berkeley and Lawrence Livermore) on an informational site tour of the Aliso Canyon leak site.

Proboszcz, Angie

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Sent: Wednesday, December 16, 2015 12:33 PM
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Cc: Lindsay, Nancy; Irizarry, Gilberto; Schumann, Jean; Lee, Eugene
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Proboszcz, Angie

From: Manzanilla, Enrique
Sent: Thursday, January 07, 2016 10:43 PM
To: Richman, Lance;Lawrence, Kathryn;Meer, Daniel
Subject: Fwd: Draft Summary of today's RRT incident specific call on Aliso Methane leak

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from my iPhone

Begin forwarded message:

From: "Manzanilla, Enrique" <Manzanilla.Enrique@epa.gov>
Date: January 7, 2016 at 10:18:43 PM PST
To: "Natarajan, Nitin" <Natarajan.Nitin@epa.gov>
Cc: "Blumenfeld, Jared" <BLUMENFELD.JARED@EPA.GOV>, "Meer, Daniel" <Meer.Daniel@epa.gov>, "Quast, Sylvia" <Quast.Sylvia@epa.gov>, "Cheatham, Reggie" <cheatham.reggie@epa.gov>, "Strauss, Alexis" <Strauss.Alexis@epa.gov>, "Jordan, Deborah" <Jordan.Deborah@epa.gov>, "Adams, Elizabeth" <Adams.Elizabeth@epa.gov>, "Johnson, Kathleen" <Johnson.Kathleen@epa.gov>
Subject: Draft Summary of today's RRT incident specific call on Aliso Methane leak

Nitin:

Here's the draft summary based on our notes of the call today. We have not yet shared this summary with the other participants for corrections, etc.

The immediate term issue is the current effort to capture and flare the methane emissions. As noted in the general update provided earlier, SoCal Gas has received permission from the local air district, South Coast Air Quality Management District, to begin construction of the first of two phases of the capture system. Completion of this system will take most of January. As you can understand, safety considerations make working around the leak challenging.

Dan Meer, my assistant Director, can listen in on the call tomorrow and be ready to answer any clarifying questions that you may want to direct to him. Let us know if that works for you. I'm up and around by 8:15 AM EST, so feel free to call me.

Enrique

415 601 2670.

sd

Aliso Canyon Incident

RRT 9 Incident Specific Call Notes

January 7, 2016

AGENDA

- **Introductions/Roll Call**
- **Meeting Objectives (Dan Meer, and others)**
- **Brief on Incident & Current Response (Dan Meer)**
- **Technical Issues, e.g., intercept wells, oil-mist reduction fence, soil-methane extraction proposal, mercaptans (corrosion?)*, etc. (All)**
- **Federal Regulatory Authorities Germaine to this Incident (All)**
- **Follow-up Actions & Schedule additional meetings if needed (Lance Richman)**
- **Adjourn**

~~~~~

**Notes:**

Objectives of the call were to provide timely situational awareness on this incident and to insure communication between federal stakeholders.

Brief out:

- 23 October 2015 a gas production well (~8500' completion) completed in a gas storage reservoir at Aliso Canyon Field failed and began releasing methane to the environment
- The leak is suspected to be in the shallow casing string
- Aliso Canyon is one of four natural gas storage facilities in California
- ~115 wells are completed into the reservoir and it contains ~86 billion cubic feet of gas
- The first relief well is down to 6000'. Target completion - end of February
- The second relief well is to be spudded on 1Feb2016

Southern California Gas Company (SoCalGas - operator of the field) evaluated 7 options to reduce/eliminate the releasing gas. One of those is to capture the methane through surface gas piping and manifolds placed around and in the well bore. The gasses collected will then be sent offsite and flared. PHMSA has been made aware of a number of these proposals.

There is much interest and engagement at a high level by the federal government on this incident.

Tomorrow:

White House meeting/ call

Monday:

Aliso Canyon brief out to NRT at 0900 Pacific Time

Wednesday: House Energy and Commerce Committee for Secretary Fox and Administrator McCarthy

DOT/PHMSA personnel have been on site and continue to provide support as requested by California Public Utilities Commission (CPUC).

CPUC and Division of Oil, Gas and Geothermal Resources (DOGGR) have a memorandum of agreement providing that CPUC controls/regulates above ground (pipeline) activities while DOGGR regulates down-hole and subsurface (ie, wells and reservoirs).

The California Office of Emergency Services (CalOES) is in charge of ICS implementation in the State. SoCalGas has an IC on site who conducts a daily briefing. A number of top engineering firm are contracted by SoCalGas including Boots and Coots, Fluor, AECOM. Several representatives from the National Labs (Lawrence Livermore and Lawrence Berkeley) have toured the site.

PHMSA provided a letter to CPUC on 24 December requesting they require SoCalGas to reduce gas pressure in the reservoir by eliminated any additional injections of gas and by increasing to the maximum the withdrawal of gas out of the reservoir. This request

by PHMSA as stated in the letter is for safety reasons; concerns about radiant heat from the uncontrolled release and possible fire/explosion.

Participants were unaware of any National Transportation Safety Board or Chemical Safety Board engagement.

DOT has not promulgated rules to implement the Pipeline Safety Act for natural gas storage facilities and wells.

PHMSA generally has regulatory authority that starts at grade, i.e., the valve tree. However, it remains unclear if a gas storage reservoir is regulated under the Pipelines Safety Act or other DOT/PHMSA regulations. In any case PHMSA has delegated its authority to regulate pipelines to California.

EPA does not have CERCLA authority (petroleum exclusion) to respond or take action. A review of Clean Air Act (CAA) guidance/regulatory language i.e., RMP, CAA 112 r (7), indicates that they do not apply as well. EPA could issue an order under rarely used CAA emergency provisions (CAA 303). It would require consultation with the State. EPA would likely have to make a precise and time sensitive determination (without very deep technical expertise in this type of facility) to order an action not being pursued by the State. EPA is not in a position to make this type of determination in this situation.

**Action Item:**

EPA to work with the Department of Energy and engage, e.g., provide support, acquire situational awareness, etc., with the federal laboratories supporting the State for this incident. Both Sandia and Lawrence Livermore were identified as technical support by DOGGR in its December order to SoCal Gas.

**END**

**Participants:**

Woytak, John

FEMA Region 9

[John.Woytak@fema.dhs.gov](mailto:John.Woytak@fema.dhs.gov)

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Senior Emergency Services Coordinator

Hazardous Materials Section

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Superfund Division

Emergency Response, Preparedness and Prevention Branch

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415.971.6792 (C)

Kay Lawrence, Section Chief

Preparedness and Prevention Section

415.972.3099(O)

Enrique Manzanilla, Director

Superfund Division

US EPA, Region 9

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San Francisco, CA 94105

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[Manzanilla.enrique@Epa.gov](mailto:Manzanilla.enrique@Epa.gov)

Lance Richman

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U.S. EPA Pacific Southwest Region

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24 Hour Oil Spill Response: 1.800.424.8802

[Richman.lance@epa.gov](mailto:Richman.lance@epa.gov)

Richard Franklin

FOSC

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Sam Brinker

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[Sam.brinker@nnsa.doe.gov](mailto:Sam.brinker@nnsa.doe.gov)

## Proboszcz, Angie

---

**From:** Manzanilla, Enrique  
**Sent:** Thursday, January 07, 2016 10:19 PM  
**To:** Natarajan, Nitin  
**Cc:** Blumenfeld, Jared;Meer, Daniel;Quast, Sylvia;Cheatham, Reggie;Strauss, Alexis;Jordan, Deborah;Adams, Elizabeth;Johnson, Kathleen  
**Subject:** Draft Summary of today's RRT incident specific call on Aliso Methane leak  
  
**Importance:** High  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Nitin:

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Enrique

415 601 2670.

sd

**Aliso Canyon Incident**  
**RRT 9 Incident Specific Call Notes**  
**January 7, 2016**



## AGENDA

- Introductions/Roll Call
- Meeting Objectives (Dan Meer, and others)
- Brief on Incident & Current Response (Dan Meer)
- Technical Issues, e.g., intercept wells, oil-mist reduction fence, soil-methane extraction proposal, mercaptans (corrosion?)\*, etc. (All)
- Federal Regulatory Authorities Germaine to this Incident (All)
- Follow-up Actions & Schedule additional meetings if needed (Lance Richman)
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### Notes:

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**Action Item:**

EPA to work with the Department of Energy and engage, e.g., provide support, acquire situational awareness, etc., with the federal laboratories supporting the State for this incident. Both Sandia and Lawrence Livermore were identified as technical support by DOGGR in its December order to SoCal Gas.

**END**

**Participants:**

Woytak, John  
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Pipeline and Hazardous Materials Safety Administration  
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Lance Richman

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[Richman.lance@epa.gov](mailto:Richman.lance@epa.gov)

Richard Franklin

FOSC

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[Franklin.richard@epa.gov](mailto:Franklin.richard@epa.gov)

Sam Brinker

United States Department of Energy

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Phone: 9254220710

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[Sam.brinker@nnsa.doe.gov](mailto:Sam.brinker@nnsa.doe.gov)

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## Proboszcz, Angie

---

**From:** Lawrence, Kathryn  
**Sent:** Thursday, January 14, 2016 8:12 AM  
**To:** Meer, Daniel  
**Subject:** Weekly input from me

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Weekly input from me

Aliso Canyon Methane leak meeting

Kay Lawrence attended a meeting organized by Cal OSHA and CPUC and hosted by Sempra Energy to discuss the design of the Methane Capture System. PSHMA , DOGGR , SCAQMD and LA County Fire were also in attendance

ChEmical Safety Board meeting at Torrance City Hall

K Lawrence attended the chemical safety board meeting in Torrance California, at which the chemical safety board delivered the interim results of their investigation of the Exxon Mobil refinery accident that occurred in February 2015. CalOSHA and CalEPA were also in attendance and presented on the proposed California PSM and Refinery planning regulations. several hundred people were in attendance

Kathryn Lawrence  
Emergency Prevention and Preparedness Programs EPA Region 9  
4159723039

Sent from my iPhone

> On Jan 14, 2016, at 7:53 AM, Meer, Daniel <Meer.Daniel@epa.gov> wrote:

>

> And put together today's update?

>

> I am going to suggest to Enrique that we move to a weekly summary on

> Mondays and just update daily with high interest items. (For example,

> if there are problems with RW#1.) Sent from my iPhone Daniel Meer

> Assistant Director Superfund Division USEPA, Region 9

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---

**From:** Meer, Daniel  
**Sent:** Monday, January 04, 2016 2:04 PM  
**To:** Richman, Lance <[Richman.Lance@epa.gov](mailto:Richman.Lance@epa.gov)>



**Cc:** Lawrence, Kathryn <[Lawrence.Kathryn@epa.gov](mailto:Lawrence.Kathryn@epa.gov)>; [Timothy.P.Holmes@uscg.mil](mailto:Timothy.P.Holmes@uscg.mil)

**Subject:** FW: Aliso Canyon Coordination

Lance – I will need some time on the agenda next week to brief out on the Aliso Canyon methane leak. I also want to convene an incident specific RRT call, just for situational awareness for DOT, DOE and DOI.

Ideally I would like to have representatives from the national labs on that call. Enrique and I have also reached out to Reggie Cheatham to see if we can convene something on the national level but I am not sure it will get traction. We'll see. Can you reach out to our DOE rep and see how feasible it is to get some participation from Lawrence Berkeley or Lawrence Livermore or Sandia national labs. We need expertise in deep well injection, extraction, blow out prevention etc.

Thanks, Dan

Daniel A. Meer, Assistant Director  
Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

---

**From:** [nathan.schoenkin@dot.gov](mailto:nathan.schoenkin@dot.gov) [<mailto:nathan.schoenkin@dot.gov>]

**Sent:** Monday, January 04, 2016 1:31 PM

**To:** Meer, Daniel

**Cc:** Manzanilla, Enrique; Lawrence, Kathryn; [David.Lehman@dot.gov](mailto:David.Lehman@dot.gov); [david.murk@dot.gov](mailto:david.murk@dot.gov)

**Subject:** RE: Aliso Canyon Coordination

Dan,

It was a pleasure speaking with you as well. We would definitely be interested in participating in an incident specific NRT/RRT meeting on the Aliso Canyon incident. My boss David Lehman would be the primary for the call, and David Murk would be the secondary. They have been cc'd on this email.

Please let me know how the EPA chair responds to this.

Thank you,

Nathan A. Schoenkin  
Compliance Specialist  
Emergency Support & Security  
Pipeline and Hazardous Materials Safety Administration  
Office: 202-366-4774  
Cell: 202-740-1978  
E-mail: [nathan.schoenkin@dot.gov](mailto:nathan.schoenkin@dot.gov)

---

**From:** Meer, Daniel [<mailto:Meer.Daniel@epa.gov>]

**Sent:** Monday, January 04, 2016 4:05 PM

**To:** Schoenkin, Nathan (PHMSA)

**Cc:** Manzanilla, Enrique; Lawrence, Kathryn

**Subject:** Aliso Canyon Coordination

Nathan – nice talking to you. Please do let me know what your upper management thinks about convening an incident specific NRT meeting on the Aliso Canyon incident. I will raise it with the EPA chair of the NRT as well.

It would be useful to get the federal family in good communication and more specifically, to reach out to experts beyond EPA and DOT – for example the national labs under DOE and DOI, that might have some expertise in well injection and blow out control.

Regards, Dan Meer

Daniel A. Meer, Assistant Director  
Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

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**Sent:** Monday, January 04, 2016 2:04 PM  
**To:** Richman, Lance <[Richman.Lance@epa.gov](mailto:Richman.Lance@epa.gov)>  
**Cc:** Lawrence, Kathryn <[Lawrence.Kathryn@epa.gov](mailto:Lawrence.Kathryn@epa.gov)>; [Timothy.P.Holmes@uscg.mil](mailto:Timothy.P.Holmes@uscg.mil)  
**Subject:** FW: Aliso Canyon Coordination

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Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

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**Sent:** Monday, January 04, 2016 1:31 PM  
**To:** Meer, Daniel  
**Cc:** Manzanilla, Enrique; Lawrence, Kathryn; [David.Lehman@dot.gov](mailto:David.Lehman@dot.gov); [david.murk@dot.gov](mailto:david.murk@dot.gov)  
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Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

## Proboszcz, Angie

---

**From:** Lawrence, Kathryn  
**Sent:** Monday, January 04, 2016 1:10 PM  
**To:** Johnstone, Jeremy  
**Subject:** Re: Aliso Canyon Natural Gas Leak Update 12-30-2015

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Will do

Kathryn Lawrence  
Emergency Prevention and Preparedness Programs  
EPA Region 9  
4159723039

Sent from my iPhone

On Jan 4, 2016, at 1:08 PM, Johnstone, Jeremy <[Johnstone.Jeremy@epa.gov](mailto:Johnstone.Jeremy@epa.gov)> wrote:

Can you please send this to me in Word format? Thx

---

Jeremy Johnstone  
Environmental Engineer  
Emergency Prevention and Preparedness Section (Mail Code SFD-9-3)  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
Tel: 415-972-3499  
Cell: 415-816-6584  
email: [johnstone.jeremy@epa.gov](mailto:johnstone.jeremy@epa.gov)

---

**From:** Lawrence, Kathryn  
**Sent:** Monday, January 04, 2016 11:49 AM  
**To:** Johnstone, Jeremy <[Johnstone.Jeremy@epa.gov](mailto:Johnstone.Jeremy@epa.gov)>  
**Cc:** Meer, Daniel <[Meer.Daniel@epa.gov](mailto:Meer.Daniel@epa.gov)>  
**Subject:** Fwd: Aliso Canyon Natural Gas Leak Update 12-30-2015

Kathryn Lawrence  
Emergency Prevention and Preparedness Programs  
EPA Region 9  
4159723039

Sent from my iPhone

Begin forwarded message:

**From:** "Lawrence, Kathryn" <[Lawrence.Kathryn@epa.gov](mailto:Lawrence.Kathryn@epa.gov)>

**Date:** December 30, 2015 at 5:08:25 PM PST

**To:** "Meer, Daniel" <[Meer.Daniel@epa.gov](mailto:Meer.Daniel@epa.gov)>, "Eoc, Epahq" <[Eoc.Epahq@epa.gov](mailto:Eoc.Epahq@epa.gov)>, "Johnson, Kathleen" <[Johnson.Kathleen@epa.gov](mailto:Johnson.Kathleen@epa.gov)>, "Keener, Bill" <[Keener.Bill@epa.gov](mailto:Keener.Bill@epa.gov)>, "Lee, Eugene" <[Lee.Eugene@epa.gov](mailto:Lee.Eugene@epa.gov)>, "Lindsay, Nancy" <[Lindsay.Nancy@epa.gov](mailto:Lindsay.Nancy@epa.gov)>, "Manzanilla, Enrique" <[Manzanilla.Enrique@epa.gov](mailto:Manzanilla.Enrique@epa.gov)>, "Moore, Letitia" <[Moore.Letitia@epa.gov](mailto:Moore.Letitia@epa.gov)>, "Quast, Sylvia" <[Quast.Sylvia@epa.gov](mailto:Quast.Sylvia@epa.gov)>, "Schumann, Jean" <[Schumann.Jean@epa.gov](mailto:Schumann.Jean@epa.gov)>, "Ty, Fatima" <[Ty.Fatima@epa.gov](mailto:Ty.Fatima@epa.gov)>, "Benson, Craig" <[Benson.Craig@epa.gov](mailto:Benson.Craig@epa.gov)>

**Subject:** Aliso Canyon Natural Gas Leak Update 12-30-2015

Updates are in yellow.

Note recent news regarding the CAA 114 request from ORC/Sylvia Quast:

SoCal Gas's lawyers just called us to let us know that they will not be able to provide us with all of the requested information by the end of the day tomorrow, but that they will provide us with as much as possible and will continue to provide us with the remainder as they receive it. We emphasized to them the importance of getting the information as soon as possible, to which they responded by saying it was their highest priority.

Kathryn Lawrence  
Chief, Emergency Prevention and Preparedness  
Superfund Division, EPA Region 9  
(415) 972-3039

## **MEMORANDUM**

**SUBJECT: Southern California Gas Company Methane Gas Release  
Aliso Canyon Natural Gas Storage Facility**

**FROM: Jared Blumenfeld  
Regional Administrator, Region 9**

**TO: Matthew Fritz  
Chief of Staff**

**Overview:** On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in Los Angeles County. SoCal Gas injects natural gas into abandoned oil reservoirs for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Energy Utilities.

The Aliso Canyon storage facility contains 115 gas withdrawal/injection wells. The leaking well is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet), the second largest natural gas storage facility in the United States.

Porter Ranch, an residential community of approximately 30,000 people, is located 1 mile away. More than 1,800 families have been relocated by the gas company and 1,000 remain on a waiting list. Two local elementary schools with nearly 2,000 schoolchildren and staff are slated to be moved to other schools in January.

**Current Status:** SoCal Gas is the responsible party and is attempting to plug the leaking well with a team of well-control contractors. SoCal Gas is working to kill the well from the top and drilling relief wells to kill the well from the bottom. SoCal has 157 people in their Incident Action Plan working on this relief effort.

SoCal Gas has attempted multiple 'top kill' operations, none successful. They are concerned about degrading the integrity of the well bore. The next effort will pump material such as ball bearings in heavy mud down the wellbore in an attempt to stop the flow of gas.



SoCal Gas is drilling two relief wells. The relief well, if successful, will intercept the bottom of the leaking well and pump in cement. This technique has had great success in controlling blow outs. The drilling operation continues around the clock and the relief wells are estimated to take 3-4 months to complete.

**Environmental and Public Health Issues:** Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels substantially below the flammability limit and that do not represent an acute health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness. Residents have reported effects consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing health effects to some Porter Ranch residents and is requiring that SoCal Gas provide temporary relocation “As the duration of exposure increases, these trace levels can produce significant long-term health effects,” said Department of Public Health Interim Director Cynthia Harding. “As this incident has moved from a short-term exposure event resolved within days, to now a long-term event potentially lasting months, supplemental monitoring of potentially harmful trace chemicals is warranted.”

#### **Regulatory Actions:**

**State Agencies:** Division of Oil, Gas and Geothermal Resources (DOGGR), Department of Conservation, Natural Resources Agency; California Public Utility Commission (CPUC); California Office of Emergency Services (OES); California Environmental Protection Agency (Cal/EPA).

**Local Agencies:** Los Angeles County Certified Unified Program Agency (LA County CUPA) Los Angeles County Fire/HazMat; City of Los Angeles; South Coast Air Quality Management District (SCAQMD); Los Angeles County Department of Public Health

DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas’s plans for stopping the leak.

The CPUC is conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root-cause analysis of the well blow-out.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1<sup>st</sup>, 778 households had either relocated (282) or were in

the process of relocating (496). SoCal Gas has established a community center in Porter Ranch to answer questions and assist residents with temporary relocation and claims.

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency group with expertise in plume and atmospheric modeling.

#### **Federal Actions:**

The Region is participating in daily operational calls and providing daily summaries. On 15 December, two on-scene coordinators participated in a site tour with the Los Angeles County Fire and Hazardous Materials Unit and Lawrence Livermore National Laboratory. The most direct federal authority is held by the Department of Transportation, Office of Pipeline and Hazardous Materials Safety Administration. However the DOT authority has been delegated to California and it is not clear what action DOT is willing to take in this case.

[REDACTED]

[REDACTED]

On 18 December the Region issued an information request to SoCal Gas pursuant to the Clean Air Act Section 114.

#### **Congressional Interest:**

Region 9 is drafting a response to a letter from Congressman Sherman who is requesting an active EPA role in the response. We have also responded to inquiries from Senator Boxer's office.

[REDACTED]

## Proboszcz, Angie

---

**From:** Meer, Daniel  
**Sent:** Tuesday, December 22, 2015 12:09 PM  
**To:** Schumann, Jean; Lee, Eugene  
**Cc:** Irizarry, Gilberto  
**Subject:** FW: Aliso Canyon - [REDACTED]  
**Attachments:** Aliso Canyon - [REDACTED]

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Internal memo that went to Administrator's Office.

Fyi, only. No action needed. Reggie and Nitin were cc'd on the email from Enrique.

Dan

Daniel A. Meer, Assistant Director  
Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

---

**From:** Manzanilla, Enrique  
**Sent:** Tuesday, December 22, 2015 11:50 AM  
**To:** Cheatham, Reggie; Natarajan, Nitin; Tulis, Dana  
**Cc:** Jordan, Deborah; Adams, Elizabeth; Johnson, Kathleen; Quast, Sylvia; Meer, Daniel; Moore, Letitia  
**Subject:** Fwd: Aliso Canyon - [REDACTED]

Looping.....

Sent from my iPhone

Begin forwarded message:

**From:** "Blumenfeld, Jared" <[BLUMENFELD.JARED@EPA.GOV](mailto:BLUMENFELD.JARED@EPA.GOV)>  
**Date:** December 22, 2015 at 11:43:22 AM PST  
**To:** "Strauss, Alexis" <[Strauss.Alexis@epa.gov](mailto:Strauss.Alexis@epa.gov)>, "Manzanilla, Enrique" <[Manzanilla.Enrique@epa.gov](mailto:Manzanilla.Enrique@epa.gov)>  
**Subject:** FW: Aliso Canyon - [REDACTED]

---

**From:** Blumenfeld, Jared  
**Sent:** Monday, December 21, 2015 5:10 PM  
**To:** Matthew R. Fritz ([fritz.matthew@epa.gov](mailto:fritz.matthew@epa.gov)) <[fritz.matthew@epa.gov](mailto:fritz.matthew@epa.gov)>  
**Subject:** Aliso Canyon - [REDACTED]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

DEC 18 2015

Via email (DArriola@semprautilities.com) and Certified Mail

CERTIFIED MAIL NO. 7015 0640 0007 0638 0669  
RETURN RECEIPT REQUESTED

In Reply Refer to:  
Southern California Gas Company Aliso Canyon Natural  
Gas Release

Dennis Arriola  
President and CEO  
Southern California Gas Company  
555 W 5th St  
Los Angeles, CA 90013-1010

RE: Request for Information, Southern California Gas Company Aliso Canyon Natural Gas  
Release

Dear Mr. Arriola:

The United States Environmental Protection Agency ("EPA") is conducting an investigation of the natural gas release (the "Release") at the Southern California Gas Company (the "Company's") Aliso Canyon Natural Gas Storage Facility located at 12801 Tampa Ave. in Northridge, CA, (the "Facility") that was discovered on or about October 23, 2015.

With this letter and its enclosure ("Information Request"), EPA seeks additional information and documents concerning the Company's compliance with the Clean Air Act, 42 U.S.C. §§ 7401 *et seq* ("CAA"). This Information Request is authorized pursuant to Section 114 of the CAA, 42 U.S.C. § 9614. Your responses to this letter must be made by a letter, signed by a person or persons duly authorized to represent the Company. Electronic copies of submittals are preferred. EPA believes that much of the requested information is, or should be, readily available at the Facility. If there are any responsive documents or information which you are unable to provide, please provide an explanation for, and documentation of reasons for, the Company's inability to provide that information. Please send your submittals so that they are received by no later than **December 31, 2015**. Address your response to:

Kathryn Lawrence (SFD-9-3)  
Section Chief  
Emergency Prevention and Preparedness Section  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne St.  
San Francisco, CA 94105  
lawrence.kathryn@epa.gov

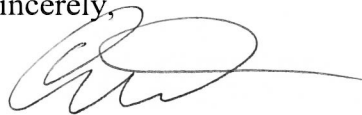
Please note that, pursuant to regulations located at 40 CFR Part 2, Subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information as defined in 40 CFR § 2.201(c). Asserting a business confidentiality claim does not relieve you from the obligation to fully respond to this letter. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 U.S.C. § 552. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulation. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. In addition, EPA has not waived any rights to take enforcement action for past or future violations.

The Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action being taken in accordance with Section 113 of the CAA, 42 U.S.C. § 7413. This may include civil and administrative penalties of up to \$37,500 per day of noncompliance. In addition, the submission of knowingly false or misleading statements may be punished by a fine pursuant to Title 18 of the U.S. Code, or by imprisonment for not more than two years, or both.

This request for information is not subject to review by the Office of Management and Budget ("OMB" under the Paperwork Reduction Act because it is not a "collection of information" within the meaning of 44 U.S.C. §§ 3502(3), 3507, and 3512. *See, also*, 4 CFR §§ 1320.3(c), 1320.5, and 1320.6(a). Furthermore, this request is exempt from OMB review under the Paperwork Reduction Act because it is part of an investigation of a specific individual or entity. 44 U.S.C. § 3518(c)(1); 5 CFR § 1320.4.

If you have questions about the legal aspects of this Information Request, please contact Ms. Letitia Moore, U.S. EPA Assistant Regional Counsel, at (415) 972-3928 or [moore.letitia@epa.gov](mailto:moore.letitia@epa.gov). The Region IX technical contact for this information request is Kathryn Lawrence, who may be reached at (415) 972-3039 or [johnstone.jeremy@epa.gov](mailto:johnstone.jeremy@epa.gov). We thank you in advance for your cooperation.

Sincerely,



Enrique Manzanilla, Director  
Superfund Division

Enclosures (2)

1 - Information Request

2 - Confidential Business Information

cc (via email w/enclosures):

Jimmie Cho, SoCalGas

John Geroch, DOGGR

Mohsen Nazemi, SCAQMD

Alice Reynolds, CalEPA

Bill Jones, LACFD

Gregory Reynar, LAFD





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

Enclosure 1

Information Request  
Southern California Gas Co.

Please provide the information requested in the Information Request section of this Enclosure such that it is received by no later than **December 31, 2015**.

**INSTRUCTIONS**

1. Please provide a separate response to each request, and identify each response by the number of the request to which it corresponds. For each document produced, identify the request to which it is responsive.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form
3. All responsive documents must be: a) provided as an accurate and legible copy in a searchable PDF file format; b) submitted on via electronic media (thumb drive, CD, or DVD); and c) number stamped in sequential order (e.g. BATES stamped). Furthermore, data should be provided in spreadsheet format (e.g., Excel format), when available, rather than as image or PDF formats.
4. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
5. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice. [Some EPA Regions refer to an enclosure such as the one I've included as "Enclosure 4" here for further discussion of the CBI issue and process].
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.

7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.

8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding the information.

## DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean the Southern California Gas Co., or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by the Company at the Aliso Canyon Natural Gas Storage Facility property or properties located at 12801 Tampa Ave. in Northridge, CA, or contiguous or adjacent to that address.

3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.

5. "Release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances, extremely hazardous substances, regulated substances, air pollutant, pollutants or contaminants. "Release" shall include "accidental release" as that term is defined by 40 C.F.R. § 68.3.

7. "Standard Operating Procedure" or "SOP" means any express method or series of protocols to be followed routinely for the performance of designated operations or in designated situations by you or your subcontractors.

8. "Well SS 25 Release" shall mean the Release of odorized natural gas from Facility Standard Sesnon Well SS 25 that commenced on or about October 23, 2015.

9. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, 40 CFR Part 302, 40 CFR Part 355 or 40 CFR Part 372, in which case the statutory or regulatory definitions shall apply.



## INFORMATION REQUEST

1. Provide the following general information:
  - a. A Facility map and plot plan, to include the well pad for Standard Sesnon Well 25 ("Well SS 25");
  - b. A description of the Facility and operations;
  - c. A management organizational chart for the Facility (include identification of personnel with environmental responsibilities); and
  - d. Descriptive information about any/all other natural gas storage fields owned or operated by the Company and/or its parent corporation.
2. With respect to the Well SS 25 Release provide copies of all submittals made to any local, state or federal agencies relating to the Release as of the date of the response to this Information Request.
3. Unless otherwise provided in response to Item 2 above, provide the following regarding the Well SS 25 Release. If provided in in response to Item 2 above, identify the corresponding document and page numbers.
  - a. A map or other depiction showing, as well as a description of, the point(s) of the Release;
  - b. A description of the cause of the Release, including all known and/or suspected root causes and contributory factors;
  - c. Design specifications for Well SS 25;
  - d. A detailed history of physical changes or modifications made to Well SS 25, including the dates such modifications were implemented and the purpose for which the modifications were made;
  - e. A description of the Company's mechanical integrity program for the inspection, testing and preventive maintenance for Well SS 25, including leak detection;
  - f. All documents that describe Standard Operating Procedures used in the inspection, testing and preventive maintenance of Well SS 25, including leak detection;
  - g. A listing of recognized and generally accepted good engineering practices, used in the development and implementation of the Company's inspection, testing and preventive maintenance of Well SS 25;
  - h. Inspection, maintenance, and leak detection records for Well SS 25 from January 1, 2012 to the present;

- i. All documents that describe Standard Operating Procedures used for accident mitigation or emergency response regarding any risks associated with the maintenance and operation of Well SS 25 or other similarly-situated wells;
- j. A description of current fire safety/prevention measures being implemented both at the Release point(s) and at the Well SS 25 wellhead;
- k. A description of current Incident Command Structure (ICS) organizational structure (ICS 207 or equivalent);
- l. Identification of any/all incident-specific website(s) that any safety and/or regulatory agencies have current access to. Provide access to EPA;
- m. Identify and provide copies of any notifications of the Release made to public agencies, including agency name; date, time and method of notification; whom contacted; and notification/report number (as applicable);
- n. Copies of the Company's policies and procedures with respect to public agency notifications of natural gas leaks at the Facility;
- o. Company-prepared estimates of release rates to the atmosphere (daily, weekly, monthly, and/or yearly) for natural gas, total volatile organic compounds (VOCs) (as defined under 40 CFR § 51.100) and total reduced sulfur (TRS) from Well SS 25 during the Well SS 25 Release, with supporting documentation of methodology/methodologies employed in arriving at estimate(s); and
- p. A description of all activities undertaken, as of the date of your response to this Information Request, to mitigate the rate and quantity of natural gas released during the Well SS 25 Release.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

Enclosure 2

**Confidential Business Information (CBI)  
Assertion and Substantiation Requirements**

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business’s competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R.

§ 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph and sentence when identifying the information subject to your claim.
2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R.

§ 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Letitia Moore  
Assistant Regional Counsel  
U.S. EPA Region 9  
75 Hawthorne St.  
San Francisco, CA 94105  
[Moore.letitia@epa.gov](mailto:Moore.letitia@epa.gov)

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your answers or comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.

## Proboszcz, Angie

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**From:** Meer, Daniel  
**Sent:** Wednesday, December 16, 2015 12:42 PM  
**To:** Manzanilla, Enrique;Lawrence, Kathryn;Allen, HarryL;Johnstone, Jeremy  
**Cc:** Lindsay, Nancy;Irizarry, Gilberto;Schumann, Jean;Lee, Eugene;Zabel, Allan  
**Subject:** RE: Alison Canyon Situational Update  
**Attachments:** Aliso Canyon Update 12.16.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[Use this version.](#) Dan

Daniel A. Meer, Assistant Director  
Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

---

**From:** Meer, Daniel  
**Sent:** Wednesday, December 16, 2015 12:33 PM  
**To:** Manzanilla, Enrique; Lawrence, Kathryn; Allen, HarryL; Johnstone, Jeremy  
**Cc:** Lindsay, Nancy; Irizarry, Gilberto; Schumann, Jean; Lee, Eugene  
**Subject:** Alison Canyon Situational Update

Update for 16 December 2015. New information is shaded yellow.

Dan

Daniel A. Meer, Assistant Director  
Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

## ***PRE DECISIONAL – ATTORNEY CLIENT PRIVILEGE – DO NOT RELEASE***

### **Southern California Gas Company Methane Release**

#### **Aliso Canyon Natural Gas Storage Facility**

**16 December 2015**

**Overview:** On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in the northern San Fernando Valley, Los Angeles County. SoCal Gas injects natural gas into the abandoned oil reservoir for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Utilities.

The Aliso Canyon storage facility is located near Porter Ranch, an affluent residential community of approximately 30,000 people. The nearest Porter Ranch residents that are being affected live approximately 1 mile away and 1200 feet below the leaking wellhead.

The Aliso Canyon facility contains 115 gas withdrawal/injection wells and the well that is leaking, Well SS 25, is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet) of natural gas, one of the largest storage facilities in the United States.

Levels of methane, the principal component of natural gas, are being monitored in the residential areas and currently do not represent a significant public health threat.

#### **Current Status:**

**Well Head Prep:** Work continues on preparing a walkway to allow safe access to the well head. They are building a 100 foot bridge for this purpose. High northerly winds are making it difficult to run equipment to the wellhead, so progress is slow.

**Relief Wells:** Relief well is on schedule and is currently drilled to 3850'. Casing is in the ground, cemented and logged, to approximately 1845'. There were some anomalies on the well log and the cemented section will be re logged. A second relief well site has been identified and grading has begun to prepare the drill pad.

**Kill Shot Prep:** They continue grading the well pad and bringing in equipment for the next 'top kill' attempt. This includes pumps and the heavy mud that they plan to pump into the well.

**Pressure Regulation:** SoCal Gas continues to withdraw gas from the facility at approximately 1 bcf/day to reduce pressure around SS-25. The top hole pressure is estimated at 1420 psi and bottom hole pressure is estimated at 1800 psi.

SoCal Gas Company has a team of well control experts that are attempting to plug the leaking well. However complex geology of the area is complicating the effort. SoCal Gas is currently

drilling two relief wells that will be used to divert gas flow away from the leaking well, and subsequently heavy muds and fluid will be pumped into the leaking well, to stop the methane release (bottom kill). The leaking well will then be permanently plugged with cement. The drilling operation continues around the clock and the relief well effort is estimated to take 3-4 months to complete. SoCal Gas is also preparing for a 'top kill' attempt, possibly early next week. They have attempted several top kills without success.

**Environmental and Public Health Issues:** Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels that are substantially below the flammability limit and that do not represent a current health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness and residents have reported effects that are consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing a health effects to some Porter Ranch residents.

**Regulatory Actions:** A large group of state and local regulatory agencies and jurisdictions are involved with the response to this methane leak.

**State Agencies:**

Division of Oil, Gas and Geothermal Resources, Department of Conservation,  
Natural Resources Agency

California Office of Emergency Services;

California Environmental Protection Agency.

**Local Agencies:**

Los Angeles County Certified Unified Program Agency (LA County CUPA)

Los Angeles County Fire/HazMat

City of Los Angeles

South Coast Air Quality Management District (SCAQMD)

Los Angeles County Department of Public Health

The Natural Resources Agency, DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas's plans for stopping the leak.



The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1<sup>st</sup>, 778 households had either relocated (282) or were in the process of relocating (496). SoCal Gas has established a

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency with expertise in plume and atmospheric modeling.

**Next Steps:**

OSCs Moxley and Musante attended a site tour on 12/16 with LA County Fire/HazMat, Lawrence Livermore National Laboratory and the California Department of Conservation.

The Region's CAA 114 information request should be ready for signature by COB 12/17.

The Region is holding daily situational update calls during the work week, starting on 12/17, at 1100 Pacific time. The Region is also participating in the daily ops call with SoCal Gas.

The Emergency Response, Preparedness and Prevention Branch has assigned an on-scene coordinator and an emergency preparedness and prevention inspector to sit in on the daily operational calls and provide daily summaries. We will develop a staffing plan that will describe how we might bring USEPA assets to assist, if we get a request from California.

[REDACTED]

On 16 December two OSCs will participate with California agencies (DOGGR, Department of Conservation) and representatives from the National Labs (Lawrence Berkeley and Lawrence Livermore) on an informational site tour of the Aliso Canyon leak site.

## Proboszcz, Angie

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**From:** Meer, Daniel  
**Sent:** Tuesday, December 15, 2015 3:14 PM  
**To:** Irizarry, Gilberto;Woodyard, Josh  
**Cc:** Tulis, Dana;Lee, Eugene;Minor, Dustin  
**Subject:** Aliso Canyon Briefing Paper  
**Attachments:** Aliso Canyon briefing paper.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

PREDECISIONAL – DO NOT RELEASE

Chico – if this comes up, here is a briefing paper on Aliso Canyon. We will hold daily calls, starting tomorrow, at 1330 Eastern, I will send you the call in number, if you want to join. Just to keep everyone apprised b/c this baby is heating up as quickly as that methane is escaping.

Ciao, Dan

Daniel A. Meer, Assistant Director  
Superfund Division  
Emergency Response, Preparedness and Prevention Branch  
415.972.3132 (O)  
415.971.6792 (C)

***PRE DECISIONAL – ATTORNEY CLIENT PRIVILEGE – DO NOT RELEASE***

**Southern California Gas Company Methane Gas Release**

**Aliso Canyon Natural Gas Storage Facility**

**15 December 2015**

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